

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF FLORIDA

3 CASE NO.: 1:22-cv-24066-KMM

4 GRACE, INC., et al.,

5 Plaintiffs,

6 vs.

7 CITY OF MIAMI,

8 Defendant.

9 -----/

10 4343 W. Flagler Street  
11 Suite 400  
12 Miami, Florida  
13 Wednesday, 10:00 a.m.  
14 October 11, 2023

15  
16 DEPOSITION

17 OF

18 CHRISTINA WHITE

19  
20  
21 Taken on behalf of the Plaintiffs

22  
23 ---  
24  
25

APPEARANCES:

ACLU FOUNDATION OF FLORIDA, by  
NICHOLAS L.V. WARREN, ESQ., (Via Zoom)  
On behalf of the Plaintiffs.

DECHERT, LLP, by  
CHRISTOPHER J. MERKEN, ESQ.,  
Co-Counsel for the Plaintiffs.

GRAY ROBINSON, by  
SYDNEY MICHELLE FELDMAN, ESQ.,  
On behalf of the Defendant.

GERI BONZON-KEENAN, COUNTY ATTORNEY, by  
MICHAEL B. VALDES, ASSISTANT COUNTY ATTORNEY, and  
SOPHIA GUZZO, ASSISTANT COUNTY ATTORNEY,  
On behalf of the Witness.

WITNESS

CHRISTINA WHITE

|                                    |    |
|------------------------------------|----|
| Direct Examination (By Mr. Merken) | 3  |
| Cross Examination (By Ms. Feldman) | 98 |

E X H I B I T S

|             |                      |    |
|-------------|----------------------|----|
| Plaintiffs' | Exhibit Number 1     | 9  |
| Plaintiffs' | Exhibit Number 12    | 54 |
| Plaintiffs' | Exhibit Number 82-23 | 74 |
| Plaintiffs' | Exhibit Number 82-37 | 77 |
| Plaintiffs' | Exhibit Number 2     | 78 |
| Plaintiffs' | Exhibit Number 3     | 82 |
| Plaintiffs' | Exhibit Number 13    | 88 |
| Plaintiffs' | Exhibit Number 5     | 89 |

1 THEREUPON:

2 CHRISTINA WHITE

3 was called as a witness by the Plaintiffs and, having  
4 first been duly sworn, was examined and testified as  
5 follows:

6 THE WITNESS: I do.

7 DIRECT EXAMINATION

8 BY MR. MERKEN:

9 Q. Good morning.

10 A. Good morning.

11 Q. Could you please state your name and spell it,  
12 for the record?

13 A. Christina White, C-H-R-I-S-T-I-N-A, W-H-I-T-E.

14 Q. And could you please state your title?

15 A. Supervisor or Elections for Miami-Dade County.

16 Q. My name is Christopher Merken. I'm a lawyer at  
17 Dechert. We represent the Plaintiffs in this case,  
18 Grace, Inc. versus the City of Miami, 22-civ-24066, in  
19 the U.S. District Court for the Southern District of  
20 Florida.

21 MR. MERKEN: And could we do appearances  
22 for everybody else?

23 MR. VALDES: Sure. Michael Valdes,  
24 Assistant County Attorney, counsel for  
25 Christina White.

1 MS. GUZZO: Sophia Guzzo, Assistant County  
2 Attorney, counsel for Christina White.

3 MS. FELDMAN: Sidney Feldman, of Gray  
4 Robinson, counsel for the City of Miami.

5 MR. MERKEN: Thank you.

6 BY MR. MERKEN:

7 Q. Ms. White, I know this is going to be boring,  
8 going over the ground rules -- I'm sure you have heard  
9 them before -- but this a deposition. A deposition is a  
10 question and answer session. I will ask the questions.  
11 You will answer those questions.

12 You took an oath a few minutes ago, and you  
13 understand that, just like in court, you must answer  
14 each and every question with complete truth and honesty?

15 We have a court reporter present, so you must  
16 answer every question verbally. If the question calls  
17 for a yes or no answer, you must answer yes or no. A  
18 nod or uh-huh is not permitted, because the court  
19 reporter may not take down everything you say. Do you  
20 understand?

21 A. I do.

22 Q. We also need to do our best to speak slowly and  
23 clearly and not talk over each other. I am guilty of  
24 that frequently. I talk very quickly. I will do my  
25 best. If I'm speaking too quickly, I'm sure the court

1 reporter will let me know, but please feel free to ask  
2 me to slow down, but we want to make sure we get a clear  
3 record.

4 Your counsel may object to the questions that I  
5 ask. Even if counsel objects, you must still answer my  
6 question, unless he directs you not to answer and you  
7 decide to follow that instruction. Do you understand?

8 A. I do.

9 Q. If you don't understand my question, please  
10 tell me. Please do not guess, just tell me if you don't  
11 understand. I will do my best to rephrase, to make the  
12 question clearer.

13 If you need a break at any time, please let me  
14 know. We have coffee, water, rest rooms. We can't take  
15 a break when a question is pending, but other than that,  
16 I'm happy to take a break whenever you need.

17 This a corporate representative deposition,  
18 also known as a Rule 30(b)(6) deposition. You have been  
19 designated by the Miami-Dade County Elections Department  
20 to answer questions on its behalf. This means you're  
21 not testifying in your personal capacity, but as if you,  
22 yourself, were the Elections Department. Do you  
23 understand?

24 A. I do.

25 Q. I may refer to the Miami-Dade County Elections

1 Department as the County, the Elections Department, the  
2 department or use the full name. I will try to be  
3 consistent, but is it fair that you understand that any  
4 permutation of that title, I am referring to the  
5 Miami-Dade County Elections Department?

6 A. Yes, I do.

7 Q. I will try -- the same thing, I will try my  
8 best to ask questions, such as, does the department  
9 believe or is it the department's position, I may say  
10 you, but, I mean -- after we get through the background  
11 and the biographical information, I mean, the County.

12 Have you take any medications or substances  
13 that might affect your ability to testify today?

14 A. No.

15 Q. Is there any other reason why you would be  
16 unable to give your full, complete and accurate  
17 testimony today?

18 A. No.

19 Q. And you understand that you are under oath and  
20 you must give your full and truthful testimony?

21 A. Yes, I do.

22 Q. Have you been deposed before?

23 A. Yes.

24 Q. How many times?

25 A. Maybe five or six.

1 Q. What was the most recent time?

2 A. It was related to some laws that were passed by  
3 the Legislature in Senate Bill 90.

4 Q. Of any of the five or six times you've been  
5 deposed, have they involved elections or redistricting?

6 A. Elections, yes; but redistricting, no.

7 Q. With respect to elections, what were those  
8 cases that you were deposed in?

9 A. There have been a variety of cases related to  
10 candidate qualifying, and, then, again, like I said,  
11 there have been, you know, several cases related to laws  
12 that the Legislature implemented throughout the State of  
13 Florida. So I was brought in, you know, as a witness,  
14 to speak how we were implementing or were planning to  
15 implement those things or what effect they had on  
16 Miami-Dade.

17 Q. Have you ever been deposed as a 30(b)(6)  
18 witness before?

19 A. Yes.

20 Q. Have you testified in any court cases?

21 A. Yes.

22 Q. Do you remember the names of those cases?

23 A. I do not.

24 Q. When you testified as a 30(b)(6) witness  
25 before, was that on behalf of Miami-Dade County?

1 A. Yes, the Elections Department.

2 Q. And you've kind of answered this, but have you  
3 spoken on behalf of the Elections Department in a  
4 legislative or administrative setting?

5 A. Yes.

6 Q. Does that include legislative or administrative  
7 settings not related to litigation?

8 A. So maybe you should elaborate on your question.

9 Q. Have you testified in hearings?

10 A. I have gone before the legislature, and also  
11 before our Board of County Commissioners, to speak on  
12 matters that relate to the department.

13 Q. Understood.

14 Have you ever been a party to a lawsuit  
15 yourself?

16 A. Yes. I think we have been, right?

17 MR. VALDES: Are you talking about her  
18 individually?

19 BY MR. MERKEN:

20 Q. I'm talking about you personally.

21 A. Oh, personally.

22 Q. This is biographical, yes.

23 A. Oh, no, I have not.

24 Q. You have not?

25 A. No.



1 Q. So you have not been a plaintiff?

2 A. No.

3 Q. You have not been a defendant?

4 A. No. No. No.

5 Q. Have you ever been a party in a criminal case?

6 A. No.

7 Q. Have you ever been arrested?

8 A. No.

9 Q. Now, when I say, "you," I'm referring to the  
10 Elections Department. We have moved out of the  
11 biographical realm.

12 A. Okay. Okay.

13 Q. You have been designated by the Elections  
14 Department to answer questions on its behalf, right?

15 A. Yes.

16 Q. When did you learn that you would be testifying  
17 in this capacity?

18 A. When I received the subpoena, which I think  
19 was, you know, a few weeks ago.

20 MR. MERKEN: Mark this as Exhibit 1.

21 (Thereupon, Plaintiffs' Exhibit Number 1 was  
22 marked for Identification.)

23 BY MR. MERKEN:

24 Q. You've just been handed what's been marked as  
25 Plaintiffs' Exhibit 1. Do you recognize this document?

1 A. Yes.

2 Q. And what is this document?

3 A. This is a subpoena to testify at a deposition  
4 in a civil action.

5 Q. And what's the date on this?

6 A. The date of the appearance or --

7 Q. The date of the subpoena.

8 A. Of the subpoena? I don't know. Is it 9/19/23?

9 Q. Yes.

10 A. Okay.

11 Q. And if you could please flip to the fourth  
12 page.

13 A. The fourth page, you said?

14 Q. The last page, yes.

15 A. Uh-huh.

16 Q. And what does this page show?

17 A. This page shows the topics that we were going  
18 to be discussing in today's deposition.

19 Q. Okay. We'll come back to this exhibit in one  
20 moment.

21 Did you, yourself, receive this subpoena or did  
22 somebody else at the County receive it?

23 A. Somebody in my office signed for it -- in my  
24 office, I did not -- and then it was provided to me.

25 Q. And how did you prepare to testify today?

1           A.   Well, of course, I reviewed these questions. I  
2 spoke to my staff members, to make sure that, you know,  
3 I understood and recalled some of the timelines and what  
4 was required for us to perform these duties in the past,  
5 and, of course, you know, reviewed it with my attorney.

6           Q.   What staff members did you meet with?

7           A.   Okay. So it would be -- do you want all of  
8 their names individually?

9           Q.   Yes, please.

10          A.   Okay. So Angela Rivero, Robert Rodriguez,  
11 Erika Sierra-Trujillo, Jose Ponce, Michael Johnson,  
12 Michelle McClain, and Xavier Pichs, P-I-C-H-S.

13          Q.   Besides those seven staff members, did you meet  
14 with anybody else in the Elections Department to prepare  
15 for your testimony?

16          A.   I think I've covered everybody.

17          Q.   Did you meet or communicate with any other  
18 County employees, outside of the Elections Department,  
19 to prepare for your testimony?

20          A.   No.

21          Q.   Did you meet or communicate with anybody from  
22 the City of Miami to prepare for your testimony?

23          A.   No.

24          Q.   About how long did you spend meeting with your  
25 staff members to prepare for your testimony?

1           A.    I mean, it was a couple of hours, over several  
2 days.

3           Q.    Did you review any documents?

4           A.    Yes.

5           Q.    What documents did you review?

6           A.    I reviewed the questionnaire and  
7 correspondences between us and the City, you know, just  
8 in terms of the normal protocols for what we receive  
9 from them preparing for their elections. I looked at  
10 some maps. I looked at cost estimates that were  
11 prepared. I looked at like the procedures for  
12 redistricting and reprecincting.

13          Q.    So besides those four or five categories, is  
14 there anything else you looked at?

15          A.    Our election calendar in 2024, our election  
16 calendar in 2023. I looked at some of the  
17 correspondences, to refresh my memory on correspondences  
18 that had occurred in the past.

19          Q.    Anything else?

20          A.    I think that covers it.

21          Q.    Okay. Did you review the Complaint in this  
22 case?

23          A.    I don't know if I did.

24          Q.    Have you reviewed any of the parties' initial  
25 disclosures?

1 A. Can you elaborate on what that is?

2 Q. No, the initial disclosures that were made as  
3 part of the litigation.

4 A. No.

5 Q. Have you reviewed any deposition transcripts  
6 from any other witnesses?

7 A. No.

8 Q. Have you reviewed any other prior testimony in  
9 this case?

10 A. No.

11 Q. Have you reviewed any other court filings?

12 A. The initial, I think, court filing. I don't  
13 know the term for it. But when, I guess, the initial  
14 case was settled, I did go through that, because I was  
15 looking at the maps and the variations in the maps, but  
16 I don't know what that court document is called.

17 Q. We'll take a look at some of them in a little  
18 bit.

19 A. Okay.

20 Q. You mentioned you had reviewed maps. Do you  
21 recall which maps those were that you had reviewed?

22 A. I just remember it was a page that had, you  
23 know, the varying maps, the City's initial map, what the  
24 plaintiffs' map looked like, and then the City's -- it  
25 was like a spread -- not a spreadsheet, but like a page

1 that had all of the varying maps on it from one of the  
2 court filings.

3 Q. Okay. Did you review any Miami-Dade County  
4 documents?

5 A. Can you elaborate? I think I answered the  
6 things that we reviewed, but if there something else  
7 that you were looking for, maybe you can be more  
8 specific.

9 Q. Sure.

10 So you had mentioned that there were policies  
11 and protocols that the County has for election  
12 administration. What are those policies and protocols?

13 A. So there's very many steps in redistricting and  
14 reprecincting, 37 varying steps, in fact, and so I don't  
15 have all of those committed to memory, and so I needed  
16 to review, with my staff, exactly what it does take for  
17 redistricting, what it took to do it the first time  
18 around, and if we're ordered to do it again, what is it  
19 going to take, so that I could properly represent to the  
20 Court today the timelines that I would need to be put in  
21 place, in order for us to be able to do this accurately.  
22 And so that was -- the steps that it entails were  
23 provided to me.

24 So I asked staff to prepare that. We talked  
25 about it. We reviewed it, to make sure that I

1 understood it, and that's what I was referring to.

2 Q. To be clear, those 37 steps, is that only for  
3 redistricting or is that for election administration,  
4 generally?

5 A. That's for redistricting/repredistricting.

6 Q. Is there another set of policies or procedures  
7 for general election administration?

8 A. I mean, that's a very broad question. We have  
9 very many policies and procedures. I didn't necessarily  
10 need to review any of those for this particular case,  
11 but I did reference a questionnaire earlier on, that we  
12 have, that we developed, that we provide to every single  
13 city, not just the City of Miami, in the preparation of  
14 their elections. And so, one of the questions on here  
15 was, the relationship, I think it was, between the City  
16 and the County. So I wanted to review what that looked  
17 like, so that I could recall, you know, what we're  
18 asking them for and what they're directing us to do, in  
19 the preparation of their election. So I reviewed that,  
20 as well.

21 Q. Thank you.

22 I'm also not asking just if you reviewed it,  
23 but if it exists, if there is a written handbook policy  
24 about election administration that Miami-Dade County  
25 has?

1 A. Oh, okay. So, in that case, yes. There are  
2 very many procedure manuals that we have --

3 Q. Approximately --

4 A. -- for varying tasks.

5 Q. Approximately how many manuals?

6 A. I don't want to guess how many.

7 Q. More than five?

8 A. Yes.

9 Q. More than ten?

10 A. Yes.

11 Q. More than twenty?

12 A. Yes.

13 Q. More than fifty?

14 A. Yes.

15 Q. Are there any --

16 A. Various divisions have different manuals, for  
17 different functions that we have.

18 Q. Understood.

19 With respect to the 37 redistricting steps, is  
20 that a single document?

21 A. It is now a single document, yes.

22 Q. Okay. Did you bring any documents with you  
23 today?

24 A. Yes.

25 Q. What are those documents?



1           A.   Well, what we're talking about now. So that I  
2   make sure I properly represent the varying steps, I have  
3   that here, and I also have cost estimates.

4           Q.   Okay. Anything else?

5           A.   No.

6           Q.   Did you take any notes in preparing for today?

7           A.   I mean, it's what essentially I have here, and,  
8   yeah, some other things, just to sort of organize my  
9   thoughts, sure.

10          Q.   And in what format are those notes?

11          A.   They are in a Word document.

12          Q.   Okay. And you don't have those notes with you  
13   today?

14          A.   I do.

15          Q.   You do have those notes, in addition to the two  
16   sets of documents?

17          A.   Yes. Yes.

18          Q.   Okay. Without divulging the subject of  
19   attorney/client communications, with whom did you speak,  
20   on the counsel side, to prepare for today?

21          A.   The two people that are in the room with me.

22          Q.   And for about how long?

23          A.   I would say, a couple of hours, over a couple  
24   of days.

25          Q.   Was anyone else, besides these two, present?

1 A. I don't believe so. No, not in these  
2 conversations we had.

3 Q. Okay. Did you review any documents in those  
4 meetings?

5 A. Yes.

6 Q. What were those documents?

7 A. The ones that I have in front of me.

8 Q. Anything else?

9 A. And, then, whatever -- I mean, you said you  
10 were going to show me the court documents from the past,  
11 right, from the previous -- I guess, earlier stages of  
12 this case. We did look at that, as well, together.

13 Q. Anything else?

14 A. I don't believe so.

15 Q. Did you take any notes in those meetings?

16 A. It's the same notes.

17 Q. Do you think there was anything else you could  
18 have done to prepare to testify today, that you did not  
19 do?

20 A. No.

21 Q. Was there anybody else you could have talked  
22 to?

23 A. I don't believe so. The people that I listed  
24 there are my deputies and my GIS specialist. So I think  
25 -- and my attorneys. So I think I've covered everyone.

1 Q. Okay. Do you live in the City of Miami?

2 A. No, I do not.

3 Q. Have you ever lived in the City of Miami?

4 A. No.

5 Q. How long have you served as Elections  
6 Supervisor?

7 A. Nine years.

8 Q. Had you worked in the Elections Department  
9 before serving as Elections Supervisor?

10 A. Yes.

11 Q. And what was the role?

12 A. Well, I've been there for over 16 years, and so  
13 I've had varying leadership roles in the department.

14 Q. Can you walk me through, from when you started,  
15 to the extent that you can recall, to serving as  
16 Elections Supervisor, what those roles were?

17 A. Sure. So I first served as Senior Executive  
18 Assistant to the Supervisor of Elections at the time.  
19 Then I was appointed as Deputy Supervisor of Elections  
20 over the Government Affairs and Media Relations  
21 Division. Then I was appointed to Chief Deputy  
22 Supervisor of Elections. And in 2015, I was appointed  
23 by the mayor at the time as Supervisor.

24 Q. So the mayor, individually, appointed you to  
25 each of those positions?

1           A.    The Supervisor of Elections, at the time,  
2           appointed me to the prior positions that I mentioned,  
3           but the mayor appointed me as Supervisor.

4           Q.    And who was the mayor who appointed you?

5           A.    Carlos Gimenez.

6           Q.    Have you ever worked for the City of Miami?

7           A.    No.

8           Q.    Have you ever worked for any other county?

9           A.    No.

10          Q.    Before the 16 years that you've spent at the  
11       Elections Department, had you worked in elections  
12       before?

13          A.    No.

14          Q.    Do you like working for the County?

15          A.    Yes, I do.

16          Q.    Why?

17          A.    Well, while my job is not easy, it gives me a  
18       great sense of pride to be able to serve the voters of  
19       Miami-Dade County. I'm a public servant at heart, and  
20       so I'm very happy doing what I do.

21          Q.    Did you go to high school?

22          A.    Yes.

23          Q.    Did you graduate from high school?

24          A.    Yes.

25          Q.    Did you go to college?

1 A. Yes.

2 Q. Where did you go?

3 A. Florida International University.

4 Q. What was your major?

5 A. Environmental Science.

6 Q. Did you have any minors?

7 A. No.

8 Q. Do you have any post-college education?

9 A. No.

10 Q. Do you have any professional certifications?

11 A. No, uh-uh.

12 Q. Are there any professional certifications in  
13 your field?

14 A. Yes.

15 Q. What are those?

16 A. One of them -- well, there's a State  
17 certification, which is the Florida Certified Election  
18 Professionals, and then there's also more of a  
19 nationwide one, through the Election Center, and I'm  
20 currently working through that one now.

21 Q. Are you a member of any trade organizations or  
22 professional associations?

23 A. Yes. I'm a member of the Florida Supervisors  
24 of Election Association.

25 Q. Any others?

1 A. Uh-uh.

2 Q. Do you hold any leadership role in that  
3 organization?

4 A. I am the co-chair of the Canvassing Board  
5 Training Committee, and I'm a member of the  
6 Cybersecurity Task Force.

7 Q. Sounds like important work.

8 What does your current job, broadly, as  
9 Supervisor of Elections, entail now?

10 A. So I oversee all elections in Miami-Dade  
11 County, from municipal elections, to County, State and  
12 Federal elections, ensuring that they're accurate and  
13 accessible, and in adherence with all of the applicable  
14 local, State and Federal laws. That entails -- it  
15 includes, but not limited to, making sure our precincts  
16 and polling places are accurately set up in our voter  
17 registration system and tabulation system, so that  
18 voters will be getting a correct ballot when they come  
19 to vote, training all of our poll workers, coding the  
20 election, preparing voting equipment, testing all of the  
21 voting equipment, sending out Vote-by-Mail ballots,  
22 administering up to 33 early voting sites, 758  
23 precincts, 550 polling places, and, of course,  
24 processing ballots, tabulating the results,  
25 disseminating them to the public, post-election audit,

1 after every election, and certifying the election, in  
2 the end, that the results are true and accurate.

3 Q. Wow. And you love doing that?

4 A. Very much.

5 Q. To whom do you report?

6 A. The mayor of Miami-Dade County.

7 Q. With whom do you work on a regular basis?

8 A. I have 130 staff members. I work with my  
9 colleagues through -- that have my same position  
10 throughout the State, the County Attorney's Office, the  
11 Mayor's Office, and I probably should say that I do have  
12 a chief, who is under the mayor, who I report directly  
13 to, municipal clerks, candidates, major political  
14 parties, activist groups, and the public.

15 Q. With whom do you work, in the Elections  
16 Department, on a day-to-day basis?

17 A. I mean, day-to-day, I would say, my Deputy  
18 Supervisor of Elections, my Assistant Deputy Supervisor  
19 of Elections, and anybody else within my department that  
20 I need to talk to, you know, regarding whatever is going  
21 on at the time.

22 Q. And who is your deputy?

23 A. The people that I named before. I have six  
24 deputies.

25 Q. And the Assistant Deputies are also on that

1 list?

2 A. Yes.

3 Q. Okay. Do you work in-person or do you work  
4 remotely?

5 A. No, I'm in the office every day.

6 Q. You had mentioned that you report to the Mayor  
7 of Miami-Dade County, and, more specifically, to his  
8 (sic) chief. Did you have any conversations with either  
9 the Mayor or the Mayor's chief about this litigation?

10 A. Just that this deposition was happening. Of  
11 course, reporting up that this is something that I  
12 needed to do, and that there was ongoing litigation, but  
13 nothing, really, more specific than that.

14 Q. Were there any conversations between your  
15 office and the Mayor's Office, between December 2022,  
16 when this litigation commenced, and preparing for this  
17 deposition?

18 A. I mean, I would just say, simply letting them  
19 know, right. It's an obligation of mine to make sure  
20 that my superiors know what it is that I'm working on.  
21 I didn't have any specific conversations with them about  
22 what I was going to be reviewing, but, yes, giving them  
23 a heads up, sure.

24 Q. Did the Mayor or the Mayor's chief issue any  
25 directives or any give you any instructions about this



1 litigation?

2 A. No.

3 Q. Are there individuals that you work with only  
4 when elections are underway, as opposed to on a  
5 day-to-day basis, besides the Mayor, parties, and the  
6 constituencies that you already mentioned?

7 A. So we always have elections going on. You  
8 know, if it's Tuesday, it's election day, we say in my  
9 department. So, you know, that's a difficult question  
10 to answer. I deal with people, as needed.

11 Q. Understood.

12 All right. I promise that's the end of the  
13 biographical, and now we're really going to move into  
14 the County questions.

15 So this is Topic 1, on Exhibit 1, and we  
16 discussed this a little bit, but to confirm, there is  
17 now a manual or a policy handbook on how to handle  
18 redistricting?

19 A. It's more the steps that it takes to conduct  
20 redistricting.

21 Q. So there's no formal policy or procedure?

22 A. No.

23 Q. How often does the City of Miami hold  
24 elections?

25 A. Well, they have their regularly scheduled

1 election in odd years. It may or may not have a runoff  
2 associated with it, right. That's to be determined.  
3 So, scheduled, it would be every other year.

4 But, then, of course, special elections do come  
5 up, as needed, if there's a vacancy that is created for  
6 some reason. We'll conduct that. And, then, you know,  
7 they also do have the option of adding questions onto  
8 County-wide ballots. I don't recall, off the top of my  
9 head, when they did that. That's something that I would  
10 probably have to research, but that would be in  
11 conjunction with an election that we're already running.

12 Q. In a regular election, which you said are on  
13 the odd years, can you walk me through that process,  
14 from start to finish? So when does the process start,  
15 all of the way through certifying the election,  
16 post-election?

17 A. Sure. So, when it's a regularly scheduled  
18 election, it's in the Charter, so we already know that  
19 it is happening. So it's on our election calendar. And  
20 so, usually, no later than 90 days out, one of my staff  
21 members will reach out to the City Clerk and have -- you  
22 know, go through what's called, you know, the election  
23 coordination questionnaire. So we are asking them at  
24 this point to start directing us on how to conduct their  
25 election, right. So we know we're having it and we know

1 the date.

2 So what races are on the ballot, when does  
3 candidate qualifying end, are there questions that are  
4 going to be on the ballot or do they want -- we have to  
5 do English and Spanish, do they want Creole, also.  
6 That's a decision that they make, because this is their  
7 election, not ours, right, and who's on their canvassing  
8 board, are they having early voting, how many sites,  
9 what's the schedule going to be, what determines a  
10 runoff, right. There's certain -- you know, a bunch --  
11 are they paying for postage on their Vote-by-Mail  
12 ballots. So it's a whole questionnaire that we go  
13 through, so that we know how we are going to proceed  
14 with running their election. They answer those  
15 questions.

16 And then we wait for the candidate qualifying  
17 -- well, with that, then we can start, you know,  
18 reaching out to our polling places, start putting our  
19 poll workers training calendar together, and start to  
20 begin certain functions that are not related to the  
21 ballot, right, certain things that we can get a head  
22 start with, because we know we're running the election.

23 So then we're waiting for candidate qualifying  
24 to end, which is a responsibility of the City Clerk.  
25 They do all of the candidate qualifying. They do all of

1 the campaign finance stuff. And then they will tell us,  
2 when it closes, these are the races, these are the  
3 people that are on the ballot. We'll prepare what's  
4 called the master ballot. We have them sign off on it,  
5 to make sure that they agree this is correct, and then  
6 we prepare -- do you want to go into exhaustive detail  
7 about all of the steps?

8 Q. Please.

9 A. Okay. So then we prepare the actual ballot,  
10 which we provide to them again, which they sign off on,  
11 to say, yes, all of the contents are correct, send it to  
12 the printer, so that we can get some test ballots. We  
13 go through all of the various testing, to make sure that  
14 we've coded the ballot correctly and that the printers  
15 are printing them properly, feed them through a certain  
16 number of tabulators, just to make sure that we've done  
17 everything correctly. Then we can give the ballot order  
18 to the printer.

19 We receive the Vote-by-Mail ballots at that  
20 point, send those out to their voters, and, you know,  
21 then proceed with setting, you know, all of the  
22 logistics related to early voting, if they're having it,  
23 which the City of Miami typically does, varying sites,  
24 depending on the size of the elections, you know,  
25 starting to place our poll workers in place, and that's

1 it.

2 Then we'll start to receive Vote-by-Mail  
3 ballots. We conduct their early voting, and when  
4 election day is completed, all of the results, of  
5 course, are coming in. We're the ones that post them  
6 onto the website.

7 It's their canvassing board, so throughout this  
8 process, their three member canvassing board will be  
9 coming into our office, reviewing Vote-by-Mail ballots  
10 that we believe are presumed invalid, for them to make  
11 the final determination on that. They also come back to  
12 look at provisional ballots. And, then, after that, we  
13 will certify the results to them. They ultimately  
14 certify the election itself to their Commission.

15 We'll conduct the post-election audit for them,  
16 and then that, really, at that point, concludes the  
17 election, and then they swear in their elected officials  
18 at that point.

19 I think I hit all of the high points.

20 Q. So, my understanding, and correct me if I'm  
21 wrong, please, is that the process, generally, in a  
22 regularly scheduled City of Miami election, generally  
23 commences, from your end, about 90 days before the  
24 election is scheduled to be held?

25 A. Yeah. No later than.

1 Q. When is your earliest it would commence, your  
2 involvement?

3 A. I mean, you know, I think like we start, you  
4 know, 120 to 90 days out, just to -- it depends on my  
5 staff.

6 Q. Are there any particular members of your  
7 department who are designated to handle the City of  
8 Miami elections?

9 A. I mean, the one person, who is our election  
10 coordinator -- her name is Liz Prieto -- she's the one  
11 that most commonly will deal with not just the City of  
12 Miami, but all City Clerks, but then she has superiors  
13 that also will communicate with the clerks, because we  
14 have relationships with everybody. So it just depends  
15 on who they reach out to.

16 But, no, not specific to cities, right.  
17 There's not a point person for the City of Miami, per  
18 se.

19 Q. Okay. You had mentioned that it's a  
20 collaborative process with the City, and we'll get more  
21 into that in a little bit, but is there anybody at the  
22 City, who is the City's point person, who generally does  
23 the outreach to your department?

24 A. So it's typically two people, Todd Hannon, who  
25 is the Clerk, and then his -- and, then, Sandra Forges,

1 who -- I don't know her title off-hand, but she's  
2 somebody who deals directly with our department for  
3 elections coordination.

4 Q. Is there -- I'm sorry.

5 A. No, it's okay. Those would be the two people.

6 Q. Is there anybody else?

7 A. Not commonly.

8 Q. Within that 90 to 120-day window that you've  
9 mentioned, are there interim deadlines for tasks to be  
10 accomplished? You ran through kind of an exhaustive  
11 list of all of the steps, but is it the case that the  
12 County has, say, at 87 days out, this need to be done,  
13 at 80 days out, this needs to be done?

14 A. Yes. So we always ask for deadlines, right,  
15 and hope that they're adhered to. So we do ask for all  
16 ballot content and everything to be given to me no later  
17 than 60 days prior to the election.

18 Q. Besides ballot content and other ballot-related  
19 materials, are there any other internal deadlines?

20 A. In just the regular election administration,  
21 just talking about conducting their election?

22 Q. Yes.

23 A. For a regularly scheduled election, it's the  
24 dates that I've already given you. It changes when it's  
25 a County-wide. When you're trying to piggyback onto a

1 County-wide election, it's a completely different  
2 situation, because I have Statutes that I need to adhere  
3 to, and I cannot wait around for a city to be giving me  
4 content late, when I have a huge election to run.

5 So, yeah -- I mean, if there's any Resolutions  
6 that need to be passed by the Commission, with  
7 questions, let's say, or if they're setting up their  
8 early voting dates and stuff like that, we always ask  
9 for everything to be given to us no later than 60 days.

10 Q. You had mentioned a County-wide election and  
11 the City piggybacking on that. Can you explain that a  
12 little bit more?

13 A. Sure. So, in this case, when I use the term,  
14 piggybacking, it's an election that we're already  
15 running. So, in 2024, we're talking about the August  
16 primary and the November general election. We are doing  
17 those elections, anyway, because, of course, it's  
18 required for all of the other, you know, County and  
19 State and Federal races. So, the cities do have an  
20 option, if they want to piggyback onto that election.  
21 It's usually not because of a race, because those are in  
22 their Charter, it's usually because they would add  
23 questions, or if it just so happens that a vacancy  
24 occurs and it aligns with our election, then we  
25 typically agree to that, as long as they give us



1 everything that we need well in advance.

2 Q. So, in that context, and we'll talk about the  
3 2024 election in a little bit, but in that context, what  
4 do those deadlines look like, as opposed to the 90 to  
5 120 days and 60 days you mentioned?

6 A. So I don't have any deadline committed to  
7 memory right now, but it's certainly well before the  
8 election. And I will tell you this, that even though  
9 you want to put something on the November ballot, we set  
10 things up as a cycle, right. So the August and November  
11 election is considered one election cycle, and I don't  
12 like to make changes. I don't like to make precinct  
13 changes, I don't like to make polling place changes, I  
14 don't like -- candidate qualifying, all of these things  
15 have to end before -- well, candidate qualifying, I  
16 should probably put that aside for a minute.

17 Everything needs to happen well in advance of  
18 the August election, so that it's set and put in place.  
19 One, off the top of my head, that I can confidently is,  
20 if you are somebody that's putting races on the November  
21 ballot, we ask that you have all candidate qualifying  
22 ending and the names provided to us by August 23rd,  
23 because the primary election is on August 20th, and I  
24 know, within a couple of days after that election, who  
25 is going to the November election. So I cannot wait

1 beyond that point.

2 So that would be a good example, that even  
3 though the election is November, I need your ballot  
4 content in August.

5 Q. Okay. We'll talk about the 2024 election in a  
6 minute, but since we were in that zone, I just wanted to  
7 mention that.

8 A. Okay.

9 Q. In a normal, regularly scheduled City election,  
10 that occurs after redistricting has happened, what does  
11 that process look like for receiving a map from the  
12 City?

13 A. Depends on the election that we're talking  
14 about, right. So, previously, I had asked for an August  
15 1st deadline for their November election. I think you  
16 probably know that, right?

17 Q. Yes.

18 A. So I asked for that, because, you know, that  
19 would give us enough time to do the steps I'm sure we'll  
20 get into a minute, for -- you know, in order to conduct  
21 their election.

22 When we talk about 2024, I'm going to be asking  
23 the Court for more time. If the Court decides that  
24 there's a different map that is going to be provided to  
25 the department, it's much earlier in the process,

1 because I need to have all of this work done well in  
2 advance of us preparing for the '24 election cycle.

3 Q. Since we're there, what date would that date  
4 be?

5 A. So I think the clearest way for me to describe  
6 dates is to give two, and I'm going to work backwards,  
7 because I really want this to be very clear to anybody  
8 who is reading a transcript, right.

9 I already alluded to the fact that the way we  
10 conduct elections is in cycles, right, and so I need to  
11 have all precincts and all polling places confirmed,  
12 without changes being made, and that's just to not  
13 burden my staff, but more importantly, not to be  
14 confusing to voters in a presidential election cycle, in  
15 advance of the August primary election. And so all of  
16 this needs to be in the voter registration system, my  
17 tabulation system and also my automated Vote-by-Mail  
18 system before candidate qualifying starts, and that's in  
19 June, for August.

20 So when you start backing out from that, what I  
21 need to have completely done and finished, and my  
22 resources not being dedicated to this particular topic,  
23 no later than -- this is my request to the Court -- by  
24 May 15th. That's for me. That's for all of my internal  
25 work to be done, so that my staff can focus their

1 attention and my resources on the presidential election  
2 cycle, right. That's May 15th.

3 And so, if I back out from there, the question  
4 is, well, how much time do I need? That is a question  
5 that is very difficult for me to answer here today,  
6 because I have no idea what the changes are going to be,  
7 is it a little bit of a tweak? Are they major changes?  
8 I have no idea. And so I need to have some sort of  
9 deadline, to provide to the Court, that gives me  
10 confidence that we will be able to do this work  
11 accurately and with professionalism, and it's very, very  
12 detailed work, 37 steps, that must be done in sequential  
13 order.

14 And so my request to the Court is going to be  
15 that all of this be complete, all, you know, court  
16 cases, and like non-appealable, you know, this is the  
17 final, final, final map, by March 31st of 2024.

18 Q. Thank you. We'll talk more about the 2024  
19 election and that process, but that was a helpful clear  
20 answer to the Court. I really appreciate that. It will  
21 be crystal clear in the transcript.

22 How much does it cost to run the City of Miami  
23 elections?

24 A. A regularly scheduled election?

25 Q. Yes, a regularly scheduled election.

1           A.    A full City election is estimated at \$805,000,  
2           and that takes into consideration their current early  
3           voting model.   I do know they do make changes from time  
4           to time.

5                        So, as of today, I can say, approximately  
6           805,000.

7           Q.    Are all of those costs, the 805,000, passed on  
8           to the City?

9           A.    Yes.

10          Q.    None are absorbed by the County?

11          A.    No.

12          Q.    Is that pricing done on an election by election  
13          basis?

14          A.    Yes, it is, because costs fluctuate, right,  
15          postage changes, and, again, you know, if they change  
16          their early voting model and what have you, we will do  
17          new estimates for them.

18          Q.    So you mentioned postage changing, which I  
19          think will be happening in 2024, and the early voting  
20          model that the City uses.   Are there other factors that  
21          would impact the price of the election?

22          A.    I mean, if we have changes in, you know, the  
23          printing costs from our paper vendor.   We do hire  
24          temporary workers, so if there's a change in the  
25          temporary rate, then, of course, all of those costs

1 would be passed on.

2 Q. Any other --

3 A. So I think -- so, I think, printing, postage,  
4 temporary workers, and, then, early voting. I think  
5 those are probably the biggest factors, variables, that  
6 would impact it.

7 Q. Are there any variables on the County side that  
8 would impact the price?

9 A. We pass on the direct cost.

10 Q. Okay. So all of the testimony we just heard  
11 was about regularly scheduled elections. Now we're  
12 going to move into special elections, if we could. How  
13 does the County prepare for a special City of Miami  
14 election, that is not concurrent with another regularly  
15 scheduled election?

16 A. All of the steps that I've already described  
17 would be applicable here, as well. I think the biggest  
18 nuance that I should mention is just that, you know, at  
19 this point, we're not prepared for this election, and so  
20 there is communication that has to happen between my  
21 office and the City Clerk, as it relates to the timing  
22 of it. I know they do have -- and it depends, because  
23 if it's a vacancy, I know that's in their Charter, it's  
24 a little bit more -- not a little bit more, but a lot  
25 more strict on when they can do it, and if it's not,

1 then, there's a little bit more flexibility, but what  
2 has to happen is, by Florida Statute, the City Clerk has  
3 to request approval from the Supervisor of Elections to  
4 conduct said special election, and then we collaborate  
5 on the dates that would work for both, and, then, once  
6 that's agreed upon, then everything that I've already  
7 described would happen.

8 Q. You said that the County and the City  
9 collaborate on dates. How does that determination get  
10 made?

11 A. It's largely, on our part, based upon  
12 resources. I mean, if you look at our election  
13 calendar, and I made that comment earlier, if it's  
14 Tuesday, it's election day. You know, it's a bit funny,  
15 but not really, because it's pretty true. So it just  
16 depends on what other elections that we have going on,  
17 and if we can accommodate it, and, you know, is there a  
18 County-wide election coming up, where I have all of my  
19 resources and equipment dedicated to that, that would be  
20 a problem, right.

21 So, you know, working within the confines of  
22 their requirement by law and what it is that we're able  
23 to accomplish with resources, is usually how we get  
24 there.

25 Q. What happens if the County cannot accommodate a

1 special election, when the City wants to hold it?

2 A. Then there's a provision in Florida Statute  
3 that they're free to conduct the election on their own.  
4 My only requirement is to turn over the voter  
5 registration rolls to them. Thankfully, we've never had  
6 to get to that point.

7 Q. Do you know what Statute that is?

8 A. Not off the top of my head.

9 Q. Is there anybody in your office that is  
10 designated to handle special elections, as opposed to  
11 regularly scheduled elections?

12 A. No.

13 Q. So, you said, once you know that there's going  
14 to be a special election, and once that date for the  
15 special election is set, then the same 37 odd steps  
16 sequentially occur, right?

17 A. Well, the 37 steps were related to  
18 redistricting.

19 Q. I'm sorry. I'm sorry.

20 A. Yeah. So, the questionnaire, the back and  
21 forth, the directive from them on how they want us to  
22 conduct the election, would be the same.

23 Q. Is there a different election coordination  
24 questionnaire for a special election, as opposed to a  
25 regular election?



1 A. No.

2 Q. Are there any additional or different questions  
3 the County would ask the City, in preparing for the  
4 special election, as opposed to a regular election?

5 A. I cannot think of any, other than, you know,  
6 what we've already talked about, which is the date.

7 Q. And that same 90 to 120 days out is when the  
8 County would start its process of preparing for the  
9 election?

10 A. If we're lucky. We don't always have that  
11 luxury, truthfully, because if some -- and I don't know  
12 the City of Miami's Charter off the top of my head, but,  
13 in some instances, we don't always have that much time,  
14 but if it's a small city, then, you know, we're able to  
15 accommodate it.

16 Q. What is the least amount of time you've had to  
17 run a special election?

18 A. You're testing my memory on that. I'd have --

19 Q. If you remember.

20 A. I'd have to look into that.

21 Q. Are there different costs for a special  
22 election that is not concurrent with another election?

23 A. So, is your question, special, compared to a  
24 regular election?

25 Q. Yes.

1           A.    Okay.    So, meaning, a City of Miami special  
2   election, versus a City of Miami regularly scheduled  
3   election, is there a difference?

4           Q.    Yes, with one qualification, a City of Miami  
5   special election that is not concurrent with another  
6   regularly scheduled election, and a regularly scheduled  
7   City of Miami election.

8           A.    As long as it's the same number of  
9   jurisdictions at play here, right, like city versus city  
10   or two district versus two districts, right, because  
11   there   will be a variable in the cost, I don't -- unless  
12   they make a change, right, they say, I want to have  
13   three days of early voting in six sites, and five days  
14   of early voting in two sites or, you know, something  
15   like that, as long as all of the variables are the same,  
16   I can't see why there would be a different cost, right.

17                Like for -- just to take it one step further,  
18   just to make sure I'm being clear, their regular  
19   election estimate is a little bit more than their runoff  
20   election, because in their runoff election, because of  
21   the way that the timing of the cycle is, their early  
22   voting is limited, so that brings the cost down.   So, as  
23   long as the variables are the same, the cost should be  
24   the same.

25           Q.    So assuming no City requested changes, like

1 different early voting, et cetera, that special  
2 election -- a City special election -- would  
3 approximately cost \$805,000?

4 A. If it was a standalone, is my verbiage, right,  
5 on its own election, yes.

6 Q. Yes.

7 We're going to now move to the third category  
8 of elections, if we could, and you alluded to this a  
9 little bit already, but if the City of Miami wants to  
10 hold a special election concurrent with other regularly  
11 scheduled elections, County, Statewide, how does that  
12 change the process on your end?

13 A. Okay. So taking redistricting and  
14 reprecincting out of this scenario, we're just talking  
15 about adding -- piggybacking onto a County-wide  
16 election?

17 Q. Yes.

18 A. Okay. So it's really not all that burdensome  
19 for a city to piggyback onto our election, unless they  
20 decide to add a bunch of questions, making the ballot  
21 really long. Then that gets a little bit tricky. But  
22 if we are already having a scheduled election, and they  
23 ask for approval to piggyback, and adhere to our  
24 deadlines, then -- in terms of, you know, providing us  
25 with their candidate qualifying on time or providing us

1 with the questions on time, then it really is not much  
2 of an impact to us or the election. So that's always  
3 approved.

4 And, then, of course, they pay, not as much,  
5 but they pay a portion of the election to piggyback,  
6 which is mostly printing, postage, if it triggers an  
7 additional page, that I wouldn't have to do anyway,  
8 some, you know, ballot preparation costs, because now  
9 I'm adding additional styles to the election. So there  
10 is -- there's some cost to the City to do this, but it's  
11 not as much as having a standalone.

12 Q. You mentioned that the City can request to  
13 piggyback. Is there a formal request process or is it  
14 the City Clerk calls your office and says, "We want to  
15 have a special election next year"?

16 A. So we remind them, over and over, that they  
17 have to ask us, by Florida Statute, for approval in  
18 advance. So that would be the formality there. It  
19 would be that they ask us, usually by e-mail, you know,  
20 we're asking the Supervisor of Elections to add this  
21 particular race or this many questions on the ballot,  
22 and then we will reply back to them saying that, you  
23 know, yes, we do approve that, as long as you -- and  
24 then we give them the ballot deadlines, as long as you  
25 do this, and agree to pay this, right, if they ask for a

1 cost estimate, and then that's really it.

2 Q. Has the County ever rejected a request from  
3 anybody to have a special election -- a piggyback  
4 special election?

5 A. I cannot recall a time where we said, no.

6 Q. You've mentioned, for all three of these, the  
7 regularly scheduled Miami election, the special election  
8 as a standalone, your words, and the special election  
9 piggybacking, you mentioned the costs for the first two,  
10 and I want to just make sure I'm clear on the cost for  
11 the third, which is the City has a special election  
12 concurrent with, piggybacked, on a County election.

13 A. Right. So, if the City -- if the City  
14 piggybacks on a County-wide election, we're estimating  
15 that to be about 115,000.

16 Q. And that's all in, the cost for the County to  
17 run a special City election?

18 A. Yes.

19 Q. Now, you've mentioned runoffs, which we haven't  
20 yet talked about, and I will have some more questions on  
21 runoffs --

22 A. Small caveat. If there were additional  
23 questions that were added, that would trigger additional  
24 ballot pages, then they would take all of the cost of  
25 that additional ballot page for the people in their City

1 and the associated postage for the Vote-by-Mail ballots,  
2 as well, but this does not assume that that's the case.

3 Q. Understood. Thank you.

4 So, for runoffs, just briefly, what do the  
5 costs for runoffs look like, and we can go category by  
6 category, but for a regularly scheduled City election, a  
7 special City election standalone, and a special City  
8 election piggybacked?

9 A. Okay. So these are estimates, based upon  
10 previous decisions that have been made by the City, in  
11 terms of what we've already talked about, early voting  
12 and such, but just to recap, to piggyback on a  
13 County-wide election, I'm estimating it at about  
14 115,000. If there is a runoff, that occurs after the  
15 County-wide election, that does increase to \$507,000,  
16 because that's not an election that we would hold. We  
17 wouldn't be doing that otherwise. So if there is a  
18 runoff, they would be responsible for all of those  
19 direct costs.

20 Again, a standalone, using their previous early  
21 voting model, is about 805,000, and their runoff, after  
22 that election, is 606,000. And like I said, the reason  
23 it's different is just the availability of early voting.

24 Q. And, then, for regularly scheduled elections?

25 A. That's what that is. That's the same thing.

1 Q. So, for standalone and for regularly scheduled,  
2 a runoff is the same?

3 A. Yes.

4 Q. Okay. And you had said that for piggybacked  
5 elections, the cost of the runoff is 507,000; is that  
6 right?

7 A. Uh-huh.

8 Q. That's in addition to the 115,000?

9 A. Yes, if it goes to a runoff.

10 Q. If it goes to a runoff.

11 And, then, for a standalone and a regularly  
12 scheduled election, the runoff cost would be 606,000 --

13 A. Yes.

14 Q. -- in addition to the 805,000?

15 A. Yes.

16 Q. Okay. I want to talk about redistricting.

17 What happens when the City of Miami prepares a new map  
18 for the Miami City Commission? After they have prepared  
19 that map, what happens on the County side?

20 A. So, first thing first, from the City Clerk,  
21 because that is our contact, right, that we receive our  
22 direction from, on all matters related to City  
23 elections, right, we ask that it come from either Todd  
24 or Sandra -- those are our two contacts -- telling us,  
25 this is the map that we are going to be using for the

1 future, these are our new boundary lines.

2 And, then, from there, I'm happy to run through  
3 all of these varying steps, if you want me to, but just  
4 overview-wise, right, what we would first do is, take  
5 the new district maps, overlay them on our precinct  
6 maps, and start to do the research of, you know, what  
7 does this mean, like how drastic are the changes, and  
8 try to get a sense of how much work it's going to  
9 entail. And, then, you know -- it's probably best if I  
10 just read from this document, okay.

11 Okay. So I'm just going to hit highlights.  
12 I'm not going to go into all of them, but you can ask  
13 me, I guess.

14 Okay. So the first step is to review the  
15 impact to current precincts, which is, I think, as I  
16 started to say, you know, we overlay the new district  
17 boundary lines over our current precincts and identify  
18 how many precincts are impacted. This would consist of  
19 either whole precincts or are we going to have to now  
20 take that precinct and split it up.

21 We have to create the core boundary layer,  
22 identifying every single district boundary identified  
23 within that precinct, and this is used to determine if  
24 we can take that precinct and consolidate it with  
25 another one or if we're going to actually have to create



1 a brand new precinct by itself, because it doesn't share  
2 representatives with anything else.

3 If a new precincts is needed, we have to  
4 identify the precinct -- a new precinct number, one that  
5 is not being used. And, then, from there, we start  
6 doing the identification of how many voters are impacted  
7 by this. Obviously, we have to quality assure all of  
8 that stuff.

9 Then -- this is all done in our GIS system.  
10 That's where we start. And, then, once we have all of  
11 these steps completed, and we're confident in them,  
12 that's when we can start moving it into our voter  
13 registration system, which is the live production  
14 system. And so, from there, we have to start  
15 identifying each and every street range that needs to be  
16 modified and moved, to account for the new lines,  
17 quality assure all of those street ranges, and then we  
18 update our precinct and City of Miami shapefiles,  
19 provide that to the Miami-Dade County Information  
20 Technology Department, to make sure that what we have in  
21 our system is consistent with what they have in their  
22 system, to make sure that no errors have been made.

23 We add all of the new precincts into the voter  
24 registration system. We adjust the district values,  
25 which means these precincts used to be, let's say, in

1 District 1, and now they're in District 2, adjust any  
2 polling place assignments, right. So, at this point, we  
3 are figuring out, were these precincts able to be  
4 absorbed, and so, therefore -- and the polling place is  
5 able to accommodate those additional people, or, if not,  
6 that is when we have to actually start going out and  
7 surveying the City of Miami, to determine if we can find  
8 new polling locations. So it starts to get a little bit  
9 more complicated and more timely there, if I have to  
10 start surveying for new locations and trying to convince  
11 an owner of a private facility to allow us to use that  
12 facility.

13 So once all of the street ranges are identified  
14 by precinct in our voter registration system, we then do  
15 what's called a yellow dot analysis, and that's to make  
16 sure that every single voter, in every single home, was  
17 properly moved into the correct district. And there are  
18 many exceptions that occur in this, because of alias  
19 addresses and that type of thing, and so we'll have to  
20 go one by one and research each one of these addresses,  
21 and, you know, move them into -- you know, yes, we  
22 reviewed them, and, yes, this has been done properly.

23 Once all of that is done in the system, we  
24 provide these files to both, the tabulation team and our  
25 automated vote -- automated absentee ballot system, so

1 that we can make sure that all of the precincts on their  
2 end match all of the precincts on the voter registration  
3 end, to make sure that not only the voters are going to  
4 receive the correct ballot, but also that the tabulation  
5 system is going to be ready to recognize that from the  
6 system.

7 We have to update all of our asset management  
8 systems to account for the new precinct numbers, and  
9 then, you know, we already talked a little bit about the  
10 polling place analysis.

11 That is -- a lot of what I've already talked  
12 about is system type stuff. The polling places is  
13 another function altogether, because there's a lot of  
14 review and care that's taken into that. I don't want --  
15 especially going into a presidential election cycle, we  
16 need to make sure that we don't have too many people and  
17 too much turnout going into any one location, and so we  
18 really would have to review, one by one, to make sure  
19 that if we're adding an extra hundred people here or 600  
20 people there or a thousand people here, that the  
21 location can accomodate it, parking, power, equipment,  
22 all of these things, and, then, if not, you know, go out  
23 and try to locate new locations.

24 My scheduling section needs to have all of this  
25 in their system, too, so that we can have the poll

1 workers assigned to the proper new precincts. And once  
2 all of that is done, then we can begin to generate new  
3 voter information cards. That alone, is a very big  
4 project, because what we need to do is extract them in  
5 batches and send them out in batches.

6 So, are we talking about here, a few City of  
7 Miami voters, a modest amount of City of Miami voters,  
8 or all City of Miami voters? That's going to determine  
9 how many batches of cards we need to generate, quality  
10 assure and mail out, in a way that we can keep up with  
11 the call volume, and, then, of course, all of the maps,  
12 all of the statistics, all of the reports that all of  
13 the candidates and parties -- that have to be produced,  
14 quality assured and placed on the website.

15 That is just an overview of all of the steps  
16 that need to happen.

17 Q. Thank you.

18 You mentioned GIS. What is GIS?

19 A. Okay. GIS is a Geographical Information  
20 System. So it's basically electronic mapping. So we  
21 receive, you know, the files electronically. That's  
22 what we request from everybody that's done  
23 redistricting, all of the various jurisdictions, and  
24 then we place them over our GIS maps of our precinct  
25 boundaries and our current existing boundaries, and we

1 start there.

2 Q. Just to confirm, you said that the County  
3 requests GIS files from, say, the City of Miami?

4 A. Yes. Shapefiles, correct.

5 Q. Is a GIS file and a shapefile the same thing?

6 A. GIS, I guess I would categorize as more of like  
7 the generic title of like the system itself, and the  
8 shapefile is a specific type of file that we request  
9 from the City.

10 Q. Who, at the County, handles the GIS process?

11 A. Xavier Pichs, P-I-C-H-S.

12 Q. Anybody else?

13 A. I mean, he's my GIS specialist, and then he has  
14 superiors, but that is the main GIS person in my  
15 department.

16 Q. What is a Block Assignment File?

17 A. I can't answer that confidently.

18 Q. Who, at the City, handles the GIS process?

19 A. As I said, we receive these files from the  
20 Clerk, so I don't know who does them in the background.

21 Q. Would the County ever communicate directly with  
22 the City's GIS folks?

23 A. Would they ever? I don't see why not, if they  
24 had questions.

25 Q. Do you know of a time when that has happened?

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A. No.

MR. MERKEN: Please mark this as Exhibit

12.

(Thereupon, Plaintiffs' Exhibit Number 12 was marked for Identification.)

BY MR. MERKEN:

Q. I have handed you what's been marked as Plaintiffs' Exhibit 12. Do you recognize this document?

A. I don't believe I've seen this document before.

Q. I will represent to you that this is the City of Miami's reply brief in support of the City's Emergency Motion to Stay the Redistricting Order that they filed in the U.S. Court of Appeals for the Eleventh Circuit on August the 2nd, 2023.

A. Okay.

Q. If you could, please, turn to Page 9, and if you could look at Footnote 3. I'm going to read this, for the record, and I'd like you to confirm that I read it correctly.

It reads, "The Miami-Dade County's reprecincting process is complicated and time consuming (Docket Entry 24-30). The County needs detailed map with exact district boundaries. Id. The City had over a month to work with its Geographic Information Systems team to put the information together for the County.

1 With the Mandated Map, the County would have to start  
2 from scratch, adding further confusion and delay, and  
3 further running afoul of Purcell." Did I read that  
4 correctly?

5 A. Yes.

6 Q. Do you know what the City and the County did  
7 together, during that month that it said that the City  
8 has worked to prepare the detailed GIS shapefiles?

9 A. Am I missing the month? When is this?

10 Q. This is the City's writing. They say that they  
11 had a month --

12 A. But do you know like when this was, because I  
13 can't speak to what happened over that month, unless I  
14 know when --

15 Q. This would have been --

16 A. -- this is referring to, if at all, but that  
17 would help?

18 Q. Right. Well, I guess a broader question is, in  
19 2023, has the County worked with the City on shapefiles  
20 or GIS processes at all?

21 A. Not to my knowledge, no.

22 Q. Has the County received any GIS shapefiles from  
23 the City?

24 A. I mean, I know that we received their map on  
25 the 1st, right, August 1st. I would have to look back

1 and see exactly what it was that they gave us. I think  
2 they gave us what we asked for. I hadn't heard  
3 otherwise.

4 Q. But you're not sure if the City provided you a  
5 shapefile on August 1st?

6 A. No.

7 Q. We'll come back to this in a little bit.

8 Does the City re-assign voters to Districts 1,  
9 2, 3, 4 and 5 or does the County do that, once a new map  
10 is implemented?

11 A. Voters within the City?

12 Q. Yes.

13 A. Well --

14 Q. I can rephrase the question. I'm sorry if that  
15 was a confusing question.

16 A. Yeah. Thank you.

17 Q. After reprecincting has occurred and the County  
18 is provided with the map that will be used, does the  
19 City or the County actually undertake the process of  
20 moving voters from District 1 to District 2?

21 A. Okay. So you're talking about redistricting,  
22 right, because you said reprecincting, so I just want to  
23 be very clear?

24 Q. Yes. I'm sorry, redistricting.

25 A. Right. So the City provides us with the



1 boundary lines. We take the action of moving the voters  
2 from one district into the other in our systems.

3 Q. Okay. Is there a discreet cost for that  
4 process?

5 A. So we have not charged them for any of the  
6 first go around. We did it as part of our larger  
7 redistricting and reprecincting process, right, but if  
8 we are doing this again, and it takes a significant  
9 amount of time, I will be passing that charge onto them,  
10 particularly as it relates to mailing new voter  
11 information cards.

12 Q. Can you estimate, if this were to occur again,  
13 what that cost would be?

14 A. Yes. So, this is an up to number. Up to  
15 \$154,000. And, you know, again, I keep -- I guess I've  
16 said it once, I feel like I'm going to say it a lot, I'm  
17 at a disadvantage here, because if the Court orders a  
18 new map, I have no idea what the severity of those  
19 changes are going to be, right, how much time is it  
20 going to take to do all of those 37 steps, is it a  
21 little tweak or am I redoing all of the district  
22 boundary lines, right?

23 So it could take us a small amount of time or a  
24 large amount of time. How many polling places do I have  
25 to go out and search for, how many voters is it

1 impacting? So I don't -- timing and costs are very hard  
2 things for me to say here, but the up to \$154,000 is,  
3 you know, for staff time and assuming that we're sending  
4 all voters in the City of Miami new voter information  
5 cards. So it would adjust, according to what we need to  
6 do. That's the large bulk of the costs here.

7 Q. You mentioned that assumes that you would send  
8 every City of Miami resident a new voter card. Would  
9 there be a reason that you would not send every City of  
10 Miami voter a new voter card, after redistricting has  
11 occurred?

12 A. Yeah. I think it's just going to be a call --  
13 you know, a last minute decision, on our part, as to how  
14 many voters are impacted. You know, I don't feel the  
15 need to send every voter a new voter information card,  
16 if it's only affecting a small number of voters, but it  
17 may get to a point where, if it's a significant number  
18 of people impacted, then, you know, we may just make the  
19 decision to send it to everybody.

20 Q. And that would primarily be a mailing cost -- a  
21 printing and mailing cost?

22 A. Printing and mailing.

23 Q. What laws apply -- you mentioned some of them,  
24 but what laws apply to a City of Miami City Commission  
25 map and the County's implementation of their map?

1           A. That's a tough one. I mean, I think that, you  
2 know, in terms of redistricting, there's obviously laws  
3 that relate to them. That's not necessarily my  
4 department, how they do that, but you're talking about  
5 from our perspective?

6           Q. Yes.

7           A. If redistricting occurs, and then  
8 reprecincting, which is an inevitable byproduct of  
9 redistricting, just because, you know, it's part of  
10 election administration, there are requirements in the  
11 Florida Statutes that guide us on how we set up our  
12 precincts.

13                 So I don't know the Statutes off the top of my  
14 head, but, you know, there are Statutes that require us  
15 to take certain things into consideration when we're  
16 creating our precincts, and, then, the approval of those  
17 precincts, which have to go before the Board of County  
18 Commissioners.

19           Q. Are there any Statutes that govern the costs of  
20 election administration?

21           A. Not really, no.

22           Q. So there's no Statute that says it's capped at  
23 a certain cost or must meet a minimum threshold?

24           A. No.

25           Q. So you've mentioned precincting a lot, and I

1 know that conflating redistricting and reprecincting can  
2 be a bit of a problem. So can you walk me through what  
3 reprecincting looks like, assuming you have received a  
4 new map or in any election? What is reprecincting and  
5 what does it look like?

6 A. Okay. So proper election administration would  
7 mean that a single precinct has all of the same exact  
8 representatives, right, so that when voters come into  
9 that particular precinct, they all receive the same  
10 exact ballot, unless, of course, it's a primary  
11 election, and then there's a party differentiation. But  
12 we're laying down Congressional, State Senate, State  
13 House, County Commission, School Board, you name it,  
14 City of Miami Commission Districts, all on top of each  
15 other, and after you do all of that, there are boxes  
16 that are created, all throughout the County, right, and  
17 that's how you start building your precincts. So the  
18 idea for, again, efficient and professional and error  
19 free election administration, every precinct has all of  
20 the same representatives.

21 So when new districts, now that we've done all  
22 of the redistricting for all of the County and we've  
23 done all of the reprecincting for all of the County, and  
24 we are in great shape to have a very successful and  
25 accurate election in 2024, if now a new map is provided

1 to us, which is okay, as long as it's all done within  
2 the timelines that I'm hoping will be respected, then  
3 those district lines will be dropped on top of our  
4 current precinct lines.

5 If I didn't do anything further with that, then  
6 those district lines are going to start splitting  
7 precincts, right, and then I have, okay, then Precinct  
8 1 -- the people in Precinct 1, as an example, now have  
9 these representatives, and the other half have these  
10 representatives. That's not a great situation to go  
11 into a presidential election with. So, then, what do  
12 you do next?

13 You start to embark upon phase two of  
14 redistricting, which is reprecincting. So that's when  
15 you start looking at every single precinct and start to  
16 make decisions. Okay, so if Precinct 1 was split in  
17 half, can I take the voters in that half of the precinct  
18 and maybe consolidate them with somebody else? If you  
19 can do that, that's fantastic. Great, re-draw the  
20 precinct line to accomodate those people.

21 But then we have to ask ourselves what I had  
22 said earlier, can it accommodate those additional  
23 people? And hopefully it can, but, again, going into a  
24 presidential election, high voter turnout, we want to be  
25 conservative about these decisions, so that takes time.

1 That's an analysis, and review, and that's moving voters  
2 again, after we just moved them once, right.

3 If you can't consolidate them to a neighboring  
4 precinct, because they just don't share now any of the  
5 same districts -- same representatives, then we have to  
6 give it a new precinct number and figure out where is it  
7 going. Are we going to leave it in the same polling  
8 place or are we going to find a new one? And, then,  
9 that's where all the field work really comes into play  
10 for our research.

11 So you do that, so you can have voters of the  
12 same -- with the same representatives voting within the  
13 same precinct.

14 Q. Does the County ever administer elections with  
15 split precincts?

16 A. Yes, we did, in 2022.

17 Q. What happens when that occurs? I know that  
18 you've explained a little bit, but what happens when  
19 there's a split precinct?

20 A. It's just more complicated. It's more  
21 complicated for us, because it's just more of  
22 everything, right. So it's more precincts, because now,  
23 this precinct, the one scenario I described, it's a one  
24 dot "0" and then a one dot one, So now we are adding to  
25 the number of precincts, and when you start adding to

1 the number of precincts, that just makes all our work  
2 internally more complicated, in terms of, you know,  
3 coding the election, printing additional ballot styles.  
4 That means we have to quality assure additional ballot  
5 styles. That means we have to process more coming in to  
6 our system, more boxes of ballots going out to the  
7 precincts, poll workers are being told, "Now, you don't  
8 just have one precinct, you have four or six precincts,"  
9 depending on how many splits are occurring, and what is  
10 very difficult for them is, they have to get that ballot  
11 right. They need to make sure that you're getting one  
12 dot "0", the next voter is gets one dot one, and that  
13 gets even more complicated, in a primary election,  
14 because for every one of those splits, there's three.  
15 There's the Republican, the Democrat and the No Party  
16 Affiliation.

17 And so it is really not the efficient and most  
18 successful -- has it been done, yes, but is it the way  
19 to go into the 2024 election cycle? It's my opinion  
20 that that's not the way to do it.

21 Q. Understanding it may not be, and this is my  
22 phrase, not yours, best practices, to have split  
23 precincts, were there any problems with split precincts  
24 in the 2022 election administration?

25 A. There were not.

1 Q. Are voters always assigned a new polling place  
2 after redistricting?

3 A. No.

4 Q. What would impact the decision to reassign  
5 voters or not reassign voters to a new polling place,  
6 after redistricting?

7 A. I think I just answered that, probably, in my  
8 long-winded response to the previous question. If there  
9 is, you know, no impact to them, right -- I mean, not  
10 every voter, in every precinct, is going to be impacted.  
11 So I wouldn't change polling places for those people who  
12 are not impacted. It would just be the consideration of  
13 those who are.

14 Another possibility is, if a map was drawn --  
15 if there was a new map that was adopted, if that map was  
16 drawn to take into consideration the current precinct  
17 lines and not split through precincts, that would also  
18 help to expedite our work and it would not require those  
19 voters to move from their precinct or their polling  
20 location.

21 Q. Is there a current map that shows those current  
22 precincts for the 2024 election?

23 A. Yes. From our department, you mean, that we  
24 can provide?

25 Q. Yes.



1 A. Yes.

2 Q. Could you please provide that?

3 A. Sure.

4 Q. Thank you.

5 MR. VALDES: Do you want to take a break?

6 MR. MERKEN: I have one more segment, if  
7 that's okay with you.

8 MR. VALDES: That's fine.

9 BY MR. MERKEN:

10 Q. If the City of Miami were to hold a special  
11 election for all five City Commissioners in the 2024 --  
12 in November of 2024, would that change any of the  
13 answers that you've given so far this morning about what  
14 that process would look like?

15 A. No, but I will take the opportunity to  
16 reiterate a couple of things.

17 Q. Please.

18 A. My request, in order to have that happen with  
19 as little burden to my department, is to, again, have a  
20 finalized, non-appealable map completed by March 31st,  
21 so that we can do all of our work seamlessly and  
22 transition into proper election preparation, but, then,  
23 the other really important thing is that candidate  
24 qualifying must end no later than August 23rd.

25 Q. Okay. I think you've answered this, but just

1 so I'm clear on reprecincting, reprecincting has already  
2 occurred for the November 2024 election, for all of the  
3 offices that are being elected in November of 2024?

4 A. Yes.

5 Q. If the City of Miami were to hold a special  
6 runoff election for the City Commission in late November  
7 2024, after the 2024 general election, what would that  
8 process look like, from the County's perspective, given  
9 the work that it will already be doing for the November  
10 2024 elections?

11 A. Thank you for that question. So my request  
12 will be that the runoff election not be conducted any  
13 sooner than four weeks after. I need at least four  
14 weeks. There's significant post-election stuff that is  
15 required by many Statutes after a presidential election,  
16 and so I really need additional time to prepare for this  
17 election.

18 Q. You said, at least four weeks. What would be  
19 your ideal time for a runoff election, after the  
20 November 2024 election?

21 A. I would say, four or five weeks is plenty --  
22 not plenty, but four or five weeks is adequate.

23 Q. Is there any difference in cost to the City if  
24 there is one City Commission special election -- excuse  
25 me, a special election for one City Commission seat

1       versus two, versus four, versus five?

2           A.     Cost-wise?

3           Q.     Yes.

4           A.     Yes.

5           Q.     What is that difference in cost, approximately?

6           A.     Well, the election that we had for them for

7       District 2 earlier this year was 176,000.

8           Q.     So --

9           A.     So, depending, you know --

10          Q.     Would you just multiply that by the number  
11       of --

12          A.     More or less, yes.

13          Q.     Okay.    Would it be a burden on your office to  
14       hold a special election in November of 2024 for the  
15       Miami City Commission?

16          A.     With the presidential?

17          Q.     Yes.

18          A.     As long as all of my deadlines are adhered to,  
19       we will approve that.

20          Q.     Okay.

21               MR. MERKEN:   You want to take a break?

22               MR. VALDES:   Yeah.

23               MR. MERKEN:   All right.   It's 11:15.   Come  
24       back at 11:20, please.

25               (Short recess taken.)

1 BY MR. MERKEN:

2 Q. Okay. I want to go over a few things that we  
3 talked about before the break. First, you're confident  
4 that your office can effectively and properly administer  
5 a special election, if you receive the maps by the dates  
6 you provided?

7 A. The special elections you're referring to is  
8 piggybacking onto the --

9 Q. November 2024.

10 A. Then, yes.

11 Q. You had mentioned that zero split precincts and  
12 a new map would make it easier to administer. If there  
13 was zero split precincts in a new map, would that push  
14 the date back by which you could receive a new map and  
15 still effectively administer the election?

16 A. I'm not willing to do that, because I just  
17 don't know how much work is going to be required right  
18 now. So I would hope that those deadlines would still  
19 be respected.

20 Q. Is there any circumstance which would result in  
21 pushing those deadlines back, beyond what you've  
22 provided?

23 A. No. Simply because I need to have this  
24 completed in advance of preparing for the presidential  
25 election cycle.

1 Q. I wanted to make sure I understood your  
2 testimony about the per district cost of running  
3 elections, because I may have gotten a little confused.  
4 Approximately what is the per district cost for running  
5 a special election?

6 A. So I don't know if you tried to do some math,  
7 by multiplying out or something, which is what threw you  
8 off. It's not really a per district, right. What I  
9 have in front of me and what I've been discussing is  
10 based on the historical elections that the City of Miami  
11 has had, right. So, for District 2, I don't have, off  
12 the top of my head -- I don't know how many days of  
13 early voting, how many sites, right. So these are all  
14 variables that would affect the cost.

15 When you ask me per district, this was just  
16 this year and these were actuals, so that's why I can  
17 give you that, right. The standalone full city cost  
18 that I gave you, also, again, were based upon, you know,  
19 what we're estimating with the early voting schedule,  
20 and so, you know, I don't think it's that easy to just  
21 go ahead and multiply it out.

22 Q. I appreciate the clarification.

23 A. Some districts may have more Vote-by-Mail  
24 voters than others, and then that would affect postage,  
25 right. There's just some nuances in there that would

1 affect it, but these are estimates that I'm comfortable  
2 with now, that could be up or down just based upon  
3 circumstances.

4 Q. Sure.

5 And if you don't mind, if we could just go over  
6 them for my edification one more time.

7 A. Yeah.

8 Q. If you could just kind of run through them,  
9 please.

10 A. Okay. So, to piggyback on a County-wide  
11 election, we're estimating about 115,000. Should a  
12 runoff, after that piggyback, become necessary, no less  
13 than four weeks after the County-wide election, because  
14 no early voting is going to be available for that, it's  
15 \$507,000. A standalone election, at some other agreed  
16 upon time, not in conjunction with a County-wide, using  
17 the early voting model from the past, we're estimating  
18 at about 805,000. And, then, if the runoff election is  
19 conducted in just a few weeks after the election, early  
20 voting is limited, so it's 606,000. So it went down a  
21 little bit.

22 And, then, yeah -- the District 2 election was  
23 176,000.

24 Q. So, the piggyback, the 115,000, that would be  
25 the cost for the entire City, if all five Commission

1 Districts were up -- or four Commission Districts, it  
2 would be approximately 115,000?

3 A. Yes.

4 Q. That is helpful for that. Thank you for the  
5 clarification on that point.

6 A. And just so you understand, it's because we're  
7 already training the poll workers. We're already  
8 setting up the precincts, right. We're already doing  
9 all of these things anyway, and so that cost is just  
10 associated with them.

11 Q. Is there a different polling place for each  
12 precinct?

13 A. No. In some polling places, there are more  
14 than one.

15 Q. How does that work?

16 A. Well, you know, some precincts are just created  
17 really small, right, not out of our discretion, it's  
18 just the way -- I had described all of the various  
19 district boundary lines dropping on top of each other.  
20 Sometimes a precinct is created and it's really small,  
21 maybe a hundred voters, 200 voters. We're not going to  
22 have a polling place set up just for a small number of  
23 voters, when we know a percentage of them are not going  
24 to vote at all, a percentage of them are going to  
25 Vote-by-Mail, and a percentage of them are going to vote

1 early, and so now we have -- just a random number -- 50  
2 people showing up to vote on election day. We're not  
3 going to set up an entire poll for that.

4 So we make these decisions, to say, okay, we'll  
5 go ahead, and, you know, put you in a neighboring  
6 polling location, that fits our other criteria, and,  
7 therefore, that particular polling location may have  
8 more than one, and that's how we do it.

9 Q. Are there polling places that would have more  
10 than two precincts?

11 A. There are a few.

12 Q. More than three precincts?

13 A. I think, with three precincting, we've dealt  
14 with that. I think we're at three or less.

15 Q. Okay.

16 A. Yeah.

17 Q. So you would never do four?

18 A. I don't know about never.

19 Q. It would be unlikely that the County would put  
20 four precincts in one polling place?

21 A. I would like to look at our list, before  
22 answering that, but it would be uncommon.

23 Q. Are there any polling places that are a single  
24 precinct?

25 A. Yes.



1 Q. How does that decision, whether to have  
2 multiple precincts in one polling place or one precinct  
3 for one polling place work?

4 A. It's all based upon the dynamics of that  
5 particular polling location. So I don't like changing  
6 polling locations, right. My preference would always be  
7 to send people to the same place they've always been  
8 voting at forever, because people are a creature of  
9 habit, and they usually just go to the same place  
10 they've always gone to, which is another reason why I  
11 don't like making any changes between August and  
12 November. It is a set. So where you went in August,  
13 you know exactly where to go in November.

14 So we look at each polling location uniquely,  
15 and we look at its size, parking, the amount of power  
16 and the number of people that we want to send there, can  
17 it accommodate it, and if there's a precinct with 3,000  
18 people, can that polling location accommodate them?  
19 Yes, we have some precincts that have like 5,000 people  
20 in them, but it's a larger facility, right, and so it's  
21 all just based upon volume turnover assumptions and can  
22 the polling place accommodate it. They're not all  
23 created equal, and so we go one-by-one, polling place by  
24 polling place, precinct by precinct, and start making  
25 the decisions about which ones are going to be a single,

1 because it's big enough and we don't want to put too  
2 many people there, or is it a couple of small ones, and  
3 so, you know -- and the polling location can accommodate  
4 it, and does it not make financial sense to have one for  
5 each of them, and so all of that goes into the analysis.

6 MR. MERKEN: Would you please mark this as  
7 Plaintiffs' 82-23?

8 (Thereupon, Plaintiffs' Exhibit Number 82-23  
9 was marked for Identification.)

10 BY MR. MERKEN:

11 Q. I have handed you what I'll represent is the  
12 City's 2022 map for the Miami of City Commission, which  
13 has been marked as Plaintiffs' Exhibit 82-23. Are you  
14 familiar with this map?

15 A. I have seen this map, and if that's what you're  
16 representing, then, yes, this is what we would have been  
17 provided and was part of our reprecincting plan.

18 Q. When did the Elections Department receive this  
19 map?

20 A. I'm not sure if I recall what month. I want to  
21 say it was May, but I'm not sure.

22 Q. May of --

23 A. -- '22.

24 Q. May of 2022 --

25 A. Yeah.

1 Q. -- approximately?

2 A. I think.

3 Q. From whom did the County receive this map?

4 A. From the City Clerk.

5 Q. And you testified earlier that's the normal  
6 process for receiving a map, right?

7 A. Yes.

8 Q. What steps did the Elections Department take,  
9 after receiving this map in or around May of 2022?

10 A. So we were waiting for them, because we were,  
11 you know, little by little getting all of the other  
12 jurisdictions' redistricting maps. So I had mentioned  
13 earlier, right, it's Congressional, State House, State  
14 Senate, County Commission, School Board, so that we  
15 could do one holistic reprecincting, and so, you know,  
16 once we got all of the varying district lines, that's  
17 when we started to put together the County-wide  
18 redistricting plan and then the subsequent reprecincting  
19 plan.

20 Q. Did the County receive GIS or shapefile data  
21 with this map?

22 A. See, I would have to go back and confirm with  
23 my staff. I mean, I think the answer is, yes, because  
24 that's what we had told them we needed, right, and I  
25 wasn't told that we didn't receive the things that we

1 needed from the City.

2 Q. Fair enough.

3 A. Yeah.

4 Q. Did there come a time when the Elections  
5 Department learned that this map would not be used for  
6 the November 2023 elections?

7 A. Yes.

8 Q. When was that?

9 A. So that was in the end of July, I believe. I'm  
10 sorry, I don't know the dates off the top of my head.

11 Q. From whom did the County find out that this map  
12 would not be used?

13 A. From my attorney.

14 Q. What did the County do, after finding out that  
15 this map would not be used for the November 2023  
16 election?

17 A. So, what I recall is that we had the 2022 map,  
18 we had the 2023 map, right, and then we were told --

19 Q. We haven't gotten to the 2023 map.

20 A. Oh, okay.

21 Q. I wanted to walk through between finding out  
22 that this map would not be used --

23 A. Okay.

24 Q. -- and we'll get to that, but what happened  
25 after the County found out that this map, the 2022 map,

1 would not be used?

2 A. I don't recall what we did after this one. I  
3 have a clear recollection of what happened, you know,  
4 after that, yeah.

5 Q. Okay. We'll get to that in just a moment.

6 A. Okay.

7 MR. MERKEN: Would you please mark this as  
8 Plaintiffs' 82-37?

9 (Thereupon, Plaintiffs' Exhibit 82-37 was  
10 marked for Identification.)

11 BY MR. MERKEN:

12 Q. I have handed you what's been marked  
13 Plaintiffs' Exhibit 82-37, which says "P4 - Plaintiffs'  
14 Map 4," and I'll represent to you that this is the  
15 remedial map that the U.S. District Court for the  
16 Southern District of Florida ordered the City of Miami  
17 to use to remedy the 2022 map that was enjoined. Have  
18 you seen this map before?

19 A. Yes.

20 Q. When did you first see this map?

21 A. I don't recall when I first saw it.

22 Q. How did the County receive this map?

23 A. And so maybe I misspoke on the other one,  
24 because I think maybe I was actually referencing this  
25 one. So we were instructed to use this one, right. I

1 didn't receive that information from the City, but my  
2 department received it from my attorney.

3 Q. Should the County have received that  
4 information from the City?

5 A. We had asked them for it, because, again, we  
6 were waiting for direction from them on which map we  
7 were going to be using for their November 2023 election,  
8 so we did request it from them, and, you know, we were  
9 expecting it, so that we could proceed.

10 Q. And the City never provided it?

11 A. They did not. They did not.

12 Q. When you received this map, did you receive any  
13 other data, like shapefiles, with the map?

14 A. I know you've asked me that question a couple  
15 of times. I just don't recall what was in the  
16 attachments that we received regarding shapefiles.

17 MR. MERKEN: Could you mark this as  
18 Plaintiffs' Exhibit 2, please?

19 (Thereupon, Plaintiffs' Exhibit Number 2 was  
20 marked for Identification.)

21 BY MR. MERKEN:

22 Q. I have handed you what has been marked as  
23 Plaintiffs' Exhibit 2, which is the City of Miami  
24 Emergency Motion to Stay the District Court's Order,  
25 which was dated July 31st, 2023, and it was filed in the

1 U.S. Court of Appeals for the Eleventh Circuit. Have  
2 you seen this document before?

3 A. Give me a minute.

4 Q. Please.

5 A. So, yes, I have seen it.

6 Q. When did you first see it?

7 A. I was actually just reviewing this the other  
8 day in preparation for this, because I wanted to look at  
9 the differences in the maps, to refresh my memory.

10 Q. Had you seen this before you had began  
11 preparing for this deposition?

12 A. No.

13 Q. If you could turn to Page 25, please. Near the  
14 bottom of the page, and I'll read this, to confirm that  
15 it is correct, the brief states, "The Order," which I am  
16 parenthetically stating refers to the District Court's  
17 Order, quotes, "throws out the core of districts for the  
18 entire redistricting plan that have been in place since  
19 1997 and draws an incumbent out of his district. This  
20 change is sweeping and disruptive." Did I read that  
21 accurately?

22 A. Yes.

23 Q. If you could please refer back to Exhibit  
24 82-37, which is Plaintiffs' Map 4.

25 A. Okay.

1 Q. Do you agree with the City's statement that  
2 this map, quote, throws out the core of districts for  
3 the entire redistricting plan?

4 A. I can't answer that.

5 Q. Why not?

6 A. I -- maybe you should elaborate on your  
7 question.

8 Q. I'm just asking, the City has argued that this  
9 map, Plaintiffs' Map 4, throws out the core of the  
10 districts for the entire redistricting plan that's been  
11 in place since 1997. So my question is, if the  
12 Elections Department agrees that Plaintiffs' Map 4  
13 throws out the core of the districts that have been in  
14 place since 1997?

15 A. And where -- I mean, I think I have to refer to  
16 the 1997 map to answer that.

17 Q. You can also --

18 A. I'm not -- I'm sorry, go ahead.

19 Q. No, please.

20 A. No. No. No. Go on.

21 Q. That's fair.

22 A. Okay.

23 Q. Does the County agree that Plaintiffs' Map 4  
24 would be, quote, sweeping and disruptive?

25 A. I mean, I just don't -- in what regard? I



1 don't know if that's a question for me to answer.

2 Disruptive how?

3 Q. In administering the elections.

4 A. So, regardless of the map that the Court seems  
5 to find lawful, we will implement that. You know, I  
6 don't know that my opinion about the map or the  
7 districts or how disruptive it is to voters, you know,  
8 is -- that's not for me to say. In order for us to be  
9 able to conduct the election, we're fine with any map  
10 that the Court finds to be lawful, as long as the  
11 deadlines are adhered to.

12 Q. I appreciate that clarification.

13 A. Yeah.

14 Q. My question about the sweeping and disruptive  
15 language is more directed at the County.

16 A. Okay.

17 Q. Does the County Elections Department believe  
18 that this Plaintiffs' Map 4 would have been sweeping and  
19 disruptive to the County to administer in elections  
20 moving forward?

21 A. We will be able to make the changes and notify  
22 the voters in time for the election.

23 Q. Okay.

24 MR. MERKEN: If you could please mark this  
25 as Plaintiffs' Exhibit 3.

1 (Thereupon, Plaintiffs' Exhibit Number 3 was  
2 marked for Identification.)

3 BY MR. MERKEN:

4 Q. I've handed you what has been marked as  
5 Plaintiffs' Exhibit 3, which is the City of Miami's  
6 Response to the Emergency Application to Vacate the  
7 Eleventh Circuit Stay filed in the Supreme Court of the  
8 United States on -- the date is actually not on the  
9 brief. I'll confirm the date, but I am representing to  
10 you that this is the brief that the City filed in the  
11 Supreme Court.

12 A. Okay.

13 Q. Have you seen this document before?

14 A. No.

15 Q. If you could, please turn to Page 6.

16 MR. VALDES: Counsel, are you using the  
17 pagination at the bottom of the document, Page  
18 6?

19 MR. MERKEN: Yes. I may have done the  
20 pagination on these, yeah, which is why I am  
21 not quickly finding what I'm looking for. I  
22 apologize.

23 BY MR. MERKEN:

24 Q. I'm sorry.

25 A. No problem.

1 Q. We're going to set that aside. My apologies  
2 about that.

3 As of August 1st, 2023, did the County  
4 Elections Department have a detailed map with the exact  
5 district boundaries it needed to implement, the  
6 court-ordered map, for the 2023 elections?

7 MR. VALDES: Objection to the form. When  
8 you say, "Court-ordered map" --

9 BY MR. MERKEN:

10 Q. I'm sorry, Plaintiffs' Exhibit 82-37.

11 A. Okay.

12 Q. I'm sorry, Plaintiffs' Map 4.

13 A. Okay.

14 Q. As of August 1st, 2023, you said the County had  
15 this map?

16 A. Yes, we did have this map.

17 Q. And the County had the data it needed to  
18 implement this map?

19 A. To my knowledge, we did, yes.

20 Q. Would the County have had to start from scratch  
21 with this map in implementing it for the elections?

22 MS. FELDMAN: Object to the form. What  
23 election?

24 MR. MERKEN: The November 2023 elections.

25 THE WITNESS: And so what do you mean by

1 starting from scratch?

2 BY MR. MERKEN:

3 Q. I'm going to represent to you, the City has  
4 said the County would have to start from scratch, which  
5 would add confusion and delay to the election process,  
6 if the County were to implement Plaintiffs' Map 4.

7 A. So, I mean, starting from scratch is not a  
8 term -- so we had the City's map, right, then we were  
9 provided the Plaintiffs' map, and then the City's map,  
10 again, officially, from the City. There were a few days  
11 in time where we were actually able to do some  
12 preliminary work on both maps, because we didn't have a  
13 choice, right. We had given a deadline, that we were  
14 hoping was going to be respected, again, to be able to  
15 do everything in a very methodical, orderly and  
16 sequential order, that's necessary to get it all  
17 completed, and so we were in a position where we were  
18 like, okay, let's do some assessment on both maps, to  
19 get a little bit of a head start, while we wait to see  
20 which one is going to be final, and so there were some  
21 preliminary steps that were done on the Plaintiffs' map,  
22 as well as the City's map, waiting to find out from the  
23 Court what the ultimate decision was going to be.

24 So, if this one was upheld, if that's the right  
25 term to use here, then, you know, there were several

1 steps that we had started, if that answers your  
2 question.

3 Q. It does. It does. Thank you.

4 At that point in time, you had also received  
5 the City's 2023 map, right?

6 A. Right.

7 Q. Because you testified that you were working on  
8 both sets of maps to prepare to implement one or the  
9 other? Yes?

10 A. Yes.

11 Q. Okay. The amount of work that had to be done  
12 to implement the City's map -- the City's 2023 map, and  
13 the amount of work that had to be done to implement  
14 Plaintiffs' Map 4, was that the same amount of work for  
15 one map or the other map?

16 A. So, once we realized what the impact of each  
17 was going to be, are you asking about the work that  
18 would then succeed that, or in those preliminary stages?

19 Q. Both, and we can break those down. So you had  
20 said that you had started -- the County had started to  
21 do preliminary work on both, Plaintiffs' Map 4 and the  
22 City's 2023 map.

23 A. Uh-huh.

24 Q. What I'm trying to get at is, the amount of  
25 work that would have had to be done for either map,

1 would that have been the same work that would have had  
2 to be done if the County had been told, we're  
3 implementing the City's 2023 map or Plaintiffs' Map 4?

4 A. So my staff has represented that the  
5 Plaintiffs' map actually would have taken a bit less  
6 time for us to do, than the City's map, because of  
7 something that I had alluded to earlier on, which is  
8 that the district -- and I don't know if this was  
9 coincidental or if it was taken into account in the  
10 front end, but what was happening is that the district  
11 lines -- the new district lines, the proposed district  
12 lines, took into consideration full precincts.

13 And so, what that was going to require on our  
14 end, in the system, was to just take the district  
15 boundary lines and move them over, to just change where  
16 the precincts were going to lie. So that the precincts  
17 that were in District 1, let's say, now they're in  
18 District 2, whereas -- and so that's work, of course,  
19 steps within our system to make sure that all of the  
20 street ranges were done properly, and, you know, all of  
21 our quality assurance and all of that, that I mentioned  
22 earlier. All of that still has to be on the system, but  
23 not as much of the field work of identifying polling  
24 places, and it didn't have as big of an impact on voters  
25 moving to new polling locations. So that ended up

1 being, you know, less work on us, whereas the City's map  
2 split more precincts, and so not only did it take all of  
3 the work in the system of, again, moving all of the  
4 street ranges and doing all of the things that we need  
5 in our various systems, but it also then required us to  
6 do the additional polling place work, of where are we  
7 now going to move all of these people. I hope that was  
8 clear.

9 Q. Crystal.

10 Were there any other differences from the  
11 County's perspective implementing Plaintiffs' Map 4 over  
12 the City's 2023 map?

13 A. Maybe you can elaborate.

14 Q. Sure.

15 You gave examples of where the Plaintiffs' map  
16 was more cognizant, my words, not yours, of the  
17 precincts, and the City's map split more precincts,  
18 which required more on the ground work. Were there  
19 other differences, from the County's perspective, in the  
20 work it would take to implement one map over the other  
21 map?

22 A. I don't know what else to add to that.

23 Q. Okay.

24 MR. MERKEN: Mark this as Exhibit 13,  
25 please.

1 (Thereupon, Plaintiffs' Exhibit Number 13 was  
2 marked for Identification.)

3 MS. FELDMAN: Just to be clear, have these  
4 been disclosed, the extent of the documents  
5 that you're providing, in the Rule 26  
6 disclosures?

7 MR. MERKEN: They're all public files, so I  
8 presume so.

9 MS. FELDMAN: Okay.

10 BY MR. MERKEN:

11 Q. I'm handing you what's been marked as  
12 Plaintiffs' Exhibit 13, which is a letter dated August  
13 2nd, 2023, to the Clerk of Court of the U.S. Court of  
14 Appeals for the Eleventh Circuit, and it says, "Citation  
15 of Supplemental Authority in GRACE, Inc, versus City of  
16 Miami," signed by Nicholas Warren of the ACLU. I'm  
17 going to represent to you that this was filed in the  
18 Eleventh Circuit as part of the appeal process. If you  
19 could turn to page 2.

20 This is a tweet or an "X," I'm not sure which  
21 one we're calling it now, from Christina Vazquez, who  
22 says, and I'm going to quote this, for the record, it  
23 says, "@MDCElections spokesperson confirms requested  
24 from the City a copy of the map the majority of the  
25 Commissioners approved in June. We did ask for the maps



1 so that we can do certain preliminary work with both  
2 sets of maps while waiting for an order from the  
3 Appellate Court." Did I read that correctly?

4 A. Yes.

5 Q. And that was on August the 2nd, 2023?

6 A. Uh-huh.

7 Q. Who gave that statement, if you can recall?

8 A. I would be guessing, because, I mean, at that  
9 point in time, I only had one spokesperson, but I don't  
10 know for sure.

11 Q. Okay. Who was your one spokesperson at that  
12 time?

13 A. Robert Rodriguez.

14 Q. So, as of August 2nd, 2023, the County could  
15 have implemented either map?

16 A. Yes.

17 MR. MERKEN: Mark this as Exhibit 5,  
18 please.

19 (Thereupon, Plaintiffs' Exhibit Number 5 was  
20 marked for Identification.)

21 THE WITNESS: I feel like now is a good  
22 time to put on the record that part of the  
23 reason that we were able to do this, is because  
24 I had two very experienced GIS specialists at  
25 the time. There was somebody that worked under

1       Xavier, who I had mentioned earlier, who is no  
2       longer with the department, and so now I have  
3       somebody, who is relatively new, that just  
4       started in that role, and so I don't want to  
5       misrepresent to the Court that this type of  
6       activity, where I'm on a dual track, can  
7       continue, right, which is why I continue to  
8       reiterate the importance of us getting a  
9       finalized map, one time, starting from Step 1,  
10      all of the way down to 37, as soon as possible,  
11      just to make sure that we do it properly and  
12      accurately.

13   BY MR. MERKEN:

14       Q.   Understood.

15           I've handed you what's been marked Plaintiffs'  
16   Exhibit 5. This has a Bates stamp range. Just for the  
17   record, the Bates stamp range is COM24066 --

18       A.   I'm sorry, where are you?

19       Q.   I'm sorry, I'm just reading the Bates stamp,  
20   for the record.

21       A.   Oh, okay.

22       Q.   COM24066-003283.

23           MS. FELDMAN: Again, I don't think that  
24   these were included in the Rule 26 disclosures,  
25   so just to the extent that they weren't, we

1 would object, on that basis.

2 MR. MERKEN: Noted.

3 BY MR. MERKEN:

4 Q. Do you recognize this document?

5 A. Okay. Give me a second.

6 Q. Please.

7 A. Okay. Yes, I do recall it now.

8 Q. And what is this document?

9 A. Okay. Let me see. I want to see about the  
10 shapefile here.

11 Q. Sure.

12 A. Okay. Yeah, it doesn't specifically mention --  
13 okay, so this is from Nicole, who I don't know, which is  
14 why I didn't reference her earlier. I think she might  
15 be new. I'm not sure.

16 So this is an e-mail to me, saying that we are  
17 to proceed with using the City's map.

18 Q. Okay. What happened after your office received  
19 this map on August 1st, 2023?

20 A. We started doing the same, you know,  
21 preliminary work that we were doing with the Plaintiffs'  
22 map, right, which is, you know, about four or five of  
23 the first initial steps that we were able to do.

24 Q. What was the format of the map that was sent  
25 along with this?

1 A. So that's the part that I just don't recall.

2 Q. Okay. Did the County receive any other -- has  
3 the County received any other correspondence or  
4 communication from the City regarding implementation of  
5 the 2023 map?

6 A. Since this?

7 Q. Yes.

8 A. Not that I came across in my review.

9 Q. Okay. You can set all of these aside.

10 A. All right.

11 MR. VALDES: Counsel, with respect to  
12 Plaintiffs' Exhibit 5, do you have the original  
13 e-mail, with the attachments associated with  
14 them?

15 MR. MERKEN: I do, in my e-mails, because I  
16 was copied on it. This was what was produced  
17 to us in discovery, so this is what we were  
18 using, but we can go through the e-mails --

19 MR. VALDES: Okay. We'd be happy to  
20 provide the attachment, so you can see what  
21 format they were in.

22 MR. MERKEN: I appreciate that. We will  
23 take you up on that.

24 BY MR. MERKEN:

25 Q. I just have a handful of questions about the

1 administration of the February 2023 special election,  
2 because that was not involved -- the February 2023  
3 election was not impacted at all by this litigation,  
4 right?

5 A. Right.

6 Q. So how did the February 2023 special election  
7 operate, from the County's perspective, in terms of  
8 timing and administration?

9 A. Really, no differently than what I've already  
10 described, right. I mean, we were put on notice that a  
11 vacancy occurred, and, therefore, a special election was  
12 going to be necessary. My recollection is that the  
13 vacancies do have a bit of a tighter timeline, which is  
14 what I also alluded to earlier, right, but it's, you  
15 know, one district within the City of Miami. As long as  
16 the timing wasn't in the way of a County-wide or  
17 something like that, you know, that we work with  
18 everybody, because of the Charter. The Charters are  
19 strict. Sometimes they don't have that flexibility.

20 And so I think we did that in a bit less time,  
21 because the timing of it worked out for us, but every  
22 step that I've already described, would have also, you  
23 know, applied to that election.

24 Q. And you mentioned the cost, but just so it's in  
25 the same place in the transcript, that was approximately

1 \$176,000?

2 A. Yes. Uh-huh.

3 Q. With respect to the November 2023 election for  
4 the Miami City Commission, what steps are you taking to  
5 prepare for that election?

6 A. Well, I mean, for us, the election is here. We  
7 just placed Vote-by-Mail ballots in the mail yesterday,  
8 so people are voting in that election, and so, you know,  
9 at this point, our polling places are confirmed, our  
10 poll workers -- I believe we're still in the process of  
11 training our poll workers. Vote-by-Mail ballots are  
12 out. We'll continue to process those as they are  
13 coming in. Their equipment testing is coming up  
14 shortly, which is a public test, for the candidates and  
15 the public, to come in and observe that we coded  
16 everything properly and that the machines are working,  
17 and early voting begins on October 28th.

18 So, you know, ramping up with temporary workers  
19 and making sure we're ready for that, to get those  
20 locations set up, and, you know, making sure that we  
21 have the proper number of poll workers, sending out  
22 those assignment letters, so they know where to show up  
23 on election day, and, you know, their canvassing board  
24 will be coming in to meet, I'm sure, in the next week or  
25 two, to start looking at Vote-by-Mail ballots, and then

1 tabulate results and certify the election.

2 Q. And then start all over again?

3 A. Yeah.

4 Q. How much, if you know, is the November 2023  
5 election going to cost the City of Miami for the County  
6 to administer?

7 A. That's a three district. So I didn't actually  
8 ask for that estimate from my staff.

9 Q. Okay. And like with other elections, if  
10 there's a runoff, that would increase the cost?

11 A. Right. Depending on how many voter runoff,  
12 right.

13 Q. Right.

14 Okay. I just have a handful of questions about  
15 the relationship between the City and the County. We  
16 covered some of this, but just so that I'm clear on it  
17 all.

18 Is there any written agreement between the City  
19 and the County with respect to elections administration?

20 A. Formalized, no, but, you know, there's a lot of  
21 correspondence by e-mail back and forth about these  
22 things, and like I said, the questionnaire that I spoke  
23 to. You know, we receive Resolutions from them, that  
24 their Board has called for certain things, but a formal  
25 agreement, formal contract, no.

1 Q. Does the City timely pay the County for its  
2 elections administration?

3 A. To my knowledge, yes.

4 Q. Has there ever been a time when the City has  
5 refused to pay the County the full amount requested?

6 A. Not to my knowledge, no.

7 Q. How would the Elections Department assess the  
8 quality of the relationship between the City and the  
9 County, with respect to elections administration?

10 A. I think we have a great relationship with the  
11 City Clerks there.

12 Q. Does that depend on whether it's a regular  
13 election or special election?

14 A. No.

15 MR. MERKEN: Okay. Do you want to take a  
16 five-minute break? I think we're done, but I  
17 just want to --

18 MR. VALDES: Yeah.

19 (Short recess taken.)

20 BY MR. MERKEN:

21 Q. Okay. I just have one or two questions about  
22 2025.

23 A. Okay.

24 Q. There are currently three City Commission  
25 districts up for election in 2025, right?



1           A.    Yes.

2           Q.    Would there be any additional burden to the  
3   County, to administer that election, if all five  
4   districts, instead of the three districts, were up for  
5   election in 2025?

6           A.    No.

7           Q.    Would there be any additional cost?

8           A.    Yes.   Cost-wise, yes.

9           Q.    And what would those additional costs be?

10          A.    It would be associated with, you know, the  
11   additional training -- the additional temporary workers  
12   that we would need, the additional poll workers that we  
13   would need, the additional polling places that we would  
14   need, but I think the mayoral race is on the 2025  
15   election.

16          Q.    That's my understanding, as well.

17          A.    Okay.   So, then, if that's the case, it's  
18   coming to me now, then there would be no burden at all,  
19   and it wouldn't affect the cost, because we're already  
20   doing those things, anyway, for the full City.

21          Q.    That's all of the questions that I have.   Just  
22   in closing, has all of the testimony you gave today been  
23   truthful?

24          A.    Yes.

25          Q.    Is all of the testimony you gave today

1 complete?

2 A. Yes. I believe so, yes.

3 Q. Do you wish to correct any statements that you  
4 made?

5 A. No.

6 MR. MERKEN: I have no further questions.

7 CROSS EXAMINATION

8 BY MS. FELDMAN:

9 Q. I'm going to have just a few questions. If you  
10 can give me a moment to just gather my thoughts and just  
11 scroll back here.

12 A. Okay.

13 Q. Okay. So, again, just a couple of questions,  
14 very briefly. I think that you had testified earlier  
15 that implementing the Plaintiffs' Map 4, before the  
16 November '22 election, would have required somewhat less  
17 work than implementing the City's map, to the extent  
18 that it aligned better with the precincts; is that  
19 correct?

20 A. Yes.

21 MR. VALDES: Object to the form. I believe  
22 you said the 2022 election. I think you meant  
23 the 2023.

24 MS. FELDMAN: I did. Thank you very much.

25 THE WITNESS: Sorry. So, yes, that is what

1 the GIS people have represented, correct.

2 BY MS. FELDMAN:

3 Q. Okay. And just to clarify, and if you could  
4 look at Plaintiffs' Map 4, and then the '22 enjoined  
5 map, which was Plaintiffs' Exhibit -- I don't recall  
6 what the number off the top of my head -- 82-23 and  
7 82-37.

8 A. Okay.

9 Q. So I just want to clarify, in terms of -- does  
10 your testimony in any way relate to how implementing one  
11 map versus the other might impact voter confusion in  
12 different districts? In other words, would the  
13 implementation of one map -- or Plaintiffs' map create  
14 more or less voter confusion than the implementation of  
15 the City's map?

16 A. Had we done one or the other, is that your  
17 question?

18 Q. Yes.

19 A. I mean, that's very difficult to say, but in  
20 the Plaintiffs' map, by moving just the district lines  
21 in certain precincts, those people -- those voters, they  
22 would have been able that stay with their same precinct  
23 number, in their same polling location, right. So, in  
24 the City's map, there was more voter movement, because  
25 the new line being -- by splitting a precinct, we had

1 to, you know, leave some and move some, and so more  
2 voters moved with the City of Miami's map, but, you  
3 know, we took it very seriously, with our outreach,  
4 leading up to the election, and we're going to continue  
5 to do this for the entire County, because there's been  
6 reprecincting and redistricting all over Miami-Dade  
7 County, and notify all voters of the changes, in every  
8 way. So, you know, regardless, voters were notified by  
9 mail that there was a change, so hopefully they will not  
10 be confused.

11 Q. So, in terms of -- you know, other than the  
12 precinct location that the voter is going to, in terms  
13 of voter confusion, you know, what candidates are on the  
14 ballot, what district am I located in, if Plaintiffs'  
15 map -- for example, District 1, if Plaintiffs' map moves  
16 more voters out of District 1 and into a different  
17 district -- if the City's map retains a greater core of  
18 District 1 than the Plaintiffs' map, you're not speaking  
19 to whether that would create more or less confusion, are  
20 you?

21 A. No, I'm not representing that.

22 Q. And the same thing with respect to candidates  
23 being able to canvass and to reach out to their voters,  
24 if the lines change more in the Plaintiffs' map, you're  
25 not speaking to whether it would prejudice or cause

1 confusion among the candidates, are you?

2 A. No, I'm not making those kinds of claims, no.  
3 For my microcosm and this larger issue, it's all about  
4 just doing things in a timely manner, so voters can be  
5 appropriately notified, right. That's one of the  
6 reasons why our deadlines are what they are, so we can  
7 do our part to do outreach, and, then, you know, the  
8 City can do the outreach to the candidates, so that  
9 they're clear -- or potential candidates, so that  
10 they're clear.

11 Q. Understood. Thank you.

12 I think that's all of my questions -- and just  
13 to clarify, that would be with respect to every -- so I  
14 used District 1 as an example, but you have the same  
15 testimony as to District 2, 3, 4 and 5?

16 A. Yes, I do.

17 MS. FELDMAN: Thank you.

18 MR. MERKEN: Anything for you?

19 MR. VALDES: Nothing for us.

20 MR. MERKEN: We're good. Thank you.

21 MR. VALDES: We'll read.

22 (Thereupon, the reading and signing not  
23 being duly waived, the deposition was concluded  
24 at 12:20 p.m.)  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

-----  
DEPONENT

Sworn to and subscribed before me this \_\_\_\_\_  
day of \_\_\_\_\_, 2023.

-----  
NOTARY PUBLIC

CERTIFICATE OF OATH

STATE OF FLORIDA :  
SS  
COUNTY OF MIAMI-DADE:

I, NIEVES SANCHEZ, Court Reporter, and a Notary Public for the State of Florida at Large, do hereby certify that CHRISTINA WHITE personally appeared before me and was duly sworn.

WITNESS my hand and official seal in the City of Miami, County of Miami-Dade, State of Florida, this 23rd day of October, 2023.



-----  
NIEVES SANCHEZ

Notary Commission Number HH 385498  
My Notary Commission expires August 11, 2027

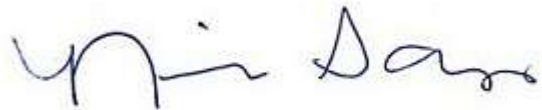
REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA :  
SS  
COUNTY OF MIAMI-DADE:

I, NIEVES SANCHEZ, Court Reporter and a Notary Public for the State of Florida at Large, do hereby certify that I was authorized to and did report the deposition of CHRISTINA WHITE; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel, nor am I financially interested in the action.

DATED this 23rd day of October, 2023.



-----  
NIEVES SANCHEZ

1 BAILEY & SANCHEZ COURT REPORTING, INC.  
2 (305) 358-2829

3 October 23, 2023  
4

5 Christina White  
6 c/o Michael B. Valdes  
7 Geri Bonzon-Keenan, County Attorney  
8 111 N.W. First Street  
9 Suite 2800  
10 Miami, Florida 33130

11 RE: Grace, Inc. vs. City of Miami

12 Dear Ms. White

13 The transcript of your deposition, taken in the  
14 above-styled cause on October 11, 2023, is at my office  
15 awaiting your examination and signature. PLEASE  
16 TELEPHONE BEFORE COMING IN so that we may arrange a  
17 convenient time.

18 Please be advised that unless I hear from you by  
19 November 23, 2023, I will forward the original of your  
20 deposition to the deposing attorney, as though you had  
21 read and signed your deposition.

22 IN THE EVENT a copy of the transcript is being sent to  
23 the witness by counsel, kindly instruct the witness to  
24 make any changes thereto on a separate sheet of paper  
25 and refer to the page number and line number which  
corresponds to the change desired. DO NOT MAKE THE  
CORRECTIONS ON THE TRANSCRIPT. If you have any  
questions, please call.

Very truly yours,



NIEVES SANCHEZ  
Court Reporter

cc: Christopher J. Merken, Esq.  
Sydney Michelle Fledman, Esq.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

ERRATA SHEET

IN RE: GRACE, INC., ET AL. vs. CITY OF MIAMI  
DEPOSITION OF TODD HANNON  
TAKEN OCTOBER 6, 2023

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

| PAGE # | LINE# | CHANGE |
|--------|-------|--------|
|--------|-------|--------|

|       |       |       |
|-------|-------|-------|
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |
| ----- | ----- | ----- |

-----  
SIGNATURE